
From: Patricia Martin <pmartin2894@yahoo.com>
Sent: Friday, June 7, 2019 2:09 AM
To: PUC: Executive.Director
Subject: Comment on DG 17-152

ATTENTION: This email has originated from outside of the organization. Do not open attachments or click on links unless you recognize the sender and know the content is safe.

June 7, 2019

Debra A. Howland

Executive Director

New Hampshire Public Utilities Commission

21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Docket No.DG17-152
Energy North Natural Gas Corp.d/b/a Liberty Utilities
2017 Least Cost Integrated Resource Plan
Pending Motions

Dear Ms. Howland,

Thank you for accepting my comments on the pending motions by Clark and Conservation Law Foundation. I am including a letter I sent to the commission in December of 2016 regarding the granting of an extension to Liberty for filing its LCIRP. As a consumer, I do not understand why Liberty was not required to present an option emphasizing energy efficiency and weatherization to free up pipeline capacity in such a way as to benefit customers instead of adding so dramatically to Liberty's rate base.

I am also troubled by research done by the Little Sis research organization that reveals that,

- "Liberty Utilities current Senior Manager for Rates and Regulatory Affairs, Steve Mullen, worked for the NHPUC for almost 16 years, until 2014. He now oversees Liberty Utilities' permit applications with regulators. The NHPUC needs to approve Granite Bridge. In other words: it appears that Liberty Utilities will have a former longtime-NHPUC employee overseeing their permit application process with the NHPUC."

I agree with the motions filed by Clark and CLF and the comment submitted by our Office of Consumer Advocate. Liberty Utilities should be ordered back to the drawing board to produce options that include weatherization and energy efficiency.

Below is my December 2016 letter to the PUC.

Patricia Martin
17 Farrar Road
Rindge, NH 03461

December 4, 2016

Debra A. Howland

Executive Director

New Hampshire Public Utilities Commission

21 South Fruit Street, Suite 10

Concord, NH 03301-2429

Re: Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities

Request to Extend Until August 1, 2017 the Deadline for Filing EnergyNorth's Next

LCIRP

Dear Ms. Howland:

I just learned of a letter from Liberty Utilities, dated November 29, 2016, requesting that the PUC extend the deadline for filing their next Least Cost Integrated Resource Plan. In the letter, Liberty Utilities alludes to "new sources of supply and capacity," which have only been shared with PUC staff and the OCA, as the cause for the delay. Liberty argues that meeting the deadline would necessitate extra work for them.

As a consumer, I am appalled by a request that will give the appearance of substantial regulatory capture. Moreover, it seems to me that an LCIRP that presents options that do NOT account for "new sources of supply and capacity," particularly "supply options including owned capacity" would be essential in evaluating proposals which do include their new supply sources. If the PUC grants the extension, won't they be giving "de facto" assent to supply and capacity options without public hearings?

Additionally, I am concerned that allowing Liberty Utilities such an extension will result in another "crisis" as occurred with the proposed purchase of Concord Steam. The public now faces raising over \$37 Million in taxes

to cover the conversion of State and School District buildings to fracked gas. Like the Concord Steam proposal, I have concerns that whatever their proposal for “new sources of supply and capacity” may be, they will be fast-tracked without sufficient discovery or public intervention. Perhaps Liberty is planning to invest in energy efficiency at levels that will create significant new sources of supply? Or perhaps they are planning to sign up for capacity on the Access Northeast Pipeline?

I respectfully request the Public Utilities Commission reject Liberty Utilities request for an extension in the filing of the LCIRP.

Sincerely,

Pat Martin