DG 14-380

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July 12, 2015

Ms. Debra Howland

Executive Director and Secretary

New Hampshire Public Utilities Commission

21 S. Fruit St, Suite 10

Concord, New Hampshire 03301

RE: DG 14-3 80 Liberty Utilities (Energy North Natural Gas) Corp. d/b/a Liberty Utilities

The approval of the contract between Liberty Utilities and Kinder Morgan for space on a proposed natural gas pipeline through 70 miles of Southern New Hampshire will have a negative impact on the environment and economics of the area. This would be the largest pipeline in diameter in New Hampshire, and would provide substantial excess capacity that could not be used in the state. The size of the project poses safety risks and passes along costs to customers that are not in line with customer needs. The project will disturb and redirect numerous aquifers, ponds, watersheds, and lakes. Noise and exhaust from blow down valves and compressor stations will disturb wildlife and will impact hunting, fishing, snowmobiling, and boating in some of the most beautiful country in New England. Is it really the time to invest in excessive infrastructure, constructing the largest gas pipeline and most powerful compressor stations to date in New Hampshire?

There are alternatives! The distance from the wellhead to the customer may be several hundred miles, and because natural gas is relatively low in energy content per unit volume, it is expensive to transport.

- One alternative is gas to power (GTP) or gas to wire (GTW). Large scale electric power generation from natural gas, perhaps via gas turbines, closer to the wellheads can then be transmitted by wire. Wire can be strung in many topographies where trenching is problematic, such as across wetlands and aquifers, granite ledge, and ravines. GTW has no incineration zone and less risk of explosion. There is no risk of gas leaks caused by earth movement or violent weather, which is safer since it takes up to 2 hours to shut down natural gas flow in a pipeline emergency. With GTW there is no risk of gas line accidents caused by stray voltage in a mixed-use utility corridor as would be the case with NED.
- Liquefied natural gas transportation has now become more economic due to improvements in technology and thermodynamic efficiencies of LNG facilities. The cost of transport per mile is less than for pipeline.
- The plan by Spectra Energy to expand the capacity for delivery of natural gas into New Hampshire along existing Spectra pipelines is another alternative to NED. This plan builds on existing infrastructure and does not disturb undeveloped and sensitive environments. The increase in capacity from this project will more than meet the needs of New Hampshire. The

Spectra Energy plan addresses how the cost of the project will be handled, while NED plans do not.

- Other methods for transporting gas include Compressed Natural Gas (CNG), Gas to Solid (GtS), and Gas to Liquid (GtL).

Please heed the testimony of Melissa Whitten, the utility consultant hired by the PUC staff, and do not approve this contract.

Respectfully,

Mrs. Gloria L Barefoot

Gloria L. Barefoot