

Debra Howland, Executive Director and Secretary
NH Public Utilities Commission
21 S. Fruit Street – Suite 10
Concord, NH 03301
July 15, 2015

Re: DG 14-380 Liberty Precedent Agreement

Dear Ms. Howland,

I have been following the discussion and proposals related to DG 14-380 and feel compelled to weigh in with my own thoughts on this decision and whether the PUC should approve the settlement agreement as proposed by PUC staff and Liberty Utilities.

I agree with the opinions offered by the OCA, Melissa Whitten, and PLAN NE on the stranded cost risk to ratepayers. Furthermore, I recently attended a webinar offered by the Regulatory Assistance Project which discussed the appropriate application of natural gas to meet short-term and long-term needs and it is my opinion that best practices advise against approving this contract which could be met by other means. Here is the link for the webinar: http://www.raonline.org/event/smart-gas-investment-how-many-swiss-army-knives-do-we?utm_source=ZohoCampaigns&utm_campaign=Webinar+Materials+-+Smart+Gas+Investment%2C+July+9th+2015-07-09+1&utm_medium=email

From my perspective as a consumer I see two major problems with allowing Liberty Utilities to contract for 115,000 DTH or even 100,000 DTH/day:

- 1.) Allowing this relatively small amount of natural gas to be contracted by a New Hampshire LDC has an impact far beyond that relatively small capacity. It is the "camel's nose under the tent" effect that the contract represents. If you approve the contract, you are accepting the impact transporting up to 2.2 bcf/day will have on New Hampshire's economy, energy future, and environment.
- 2.) The parent company of Liberty Utilities has a financial interest in the pipeline project. I would think that the PUC would be made extremely uncomfortable by these close relationships and the demand scenario presented.

If all the pipeline proposals for the New England region before FERC are approved, the capacity for natural gas to New England will grow from 3.4 bcf/day to over 7 bcf/day. I don't believe anyone could describe this as a least cost proposal when the demand for natural gas for eight months out of the year is approximately 1 bcf/day. There are other options for Liberty Utilities to get their natural gas without dragging New Hampshire into this massive overbuild of fossil fuel infrastructure so late in the game.

Sincerely,

Patricia Martin
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