

July 19, 2015

Debra Howland, Executive Director
NH Public Utilities Commission
21 South Fruit Street, Suite 10,
Concord, N.H. 03301-2429

Dear Director Howland,

Please do NOT approve Liberty Utilities (LU) Precedent Agreement (PA) Docket DG14-380. Approval of this PA would go against the recommendations of the PUC staff expert and Office of Consumer Advocate (OCA). Approval would also deny NHPUC's own stated standards of prudence, justice, and reasonableness.

NHPUC's experienced utility analysts find this contract is NOT reasonably cost-effective. OCA testimony (Table 1 page 9) clearly shows that in every year through the life of the PA (2018 - 2038) a contract for a daily total of 115,000dth from NED would cost significantly more to ratepayers than a total of 65,000dth.

The recently proposed reduction of the PA to 100,000dth is not sufficient to achieve a reasonable outcome for ratepayers. This is especially true considering the issue of fairness. OCA's Table 1 shows that ratepayers in the earlier years of the contract will pay significantly more per decatherm than those in the later years, even with a reduction to 65,000dth.

LU serves customers in the most economically active centers of NH. It is not prudent to risk inflicting LU ratepayers with excessive costs resulting from a contract that appears to be speculatively over-sized. This PA will be a burden to our state's economic core, acting as a drag on the state economy.

There appears to be a conflict of interest in this NED contract: Liberty Utilities is not only a customer of the proposed NED pipeline, but also an investor in this new infrastructure through its parent company Algonquin. It is not surprising if LU may be trying to pump up the "need" for the NED pipeline with this contract bloated beyond a substantiated market demand. With this investment, LU is risking huge stranded costs to NH ratepayers for constructing this pipeline that is sized far beyond any proven need in New England.

PUC needs to meet its own standards of prudence, justice, and reasonableness. The prudent decision for PUC would be to NOT approve this PA. As the OCA recommends, PUC needs to "require Liberty to conduct a reasonably rigorous cost-minimization exercise to analyze the appropriate capacity level to contract".

Please send LU back to the drawing board to adequately justify a contract with NED based on reasonable costs to ratepayers, with fairness over the time of the contract.

Sincerely,



Liz Fletcher
288 Marcel Road, Mason NH 03048

cc: Governor Maggie Hassan