



# State of New Hampshire

DS 14.380

HOUSE OF REPRESENTATIVES

CONCORD

P. O. Box 641  
Rindge, NH 03461

July 16, 2015

Debra Howland, Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

Dear Ms. Howland:

I am a State Representative of New Hampshire representing District 11 of Cheshire County, and a resident of Rindge, NH. I am submitting this letter on behalf of my constituents.

The PUC Staff, the OCA and PLAN-NE all submitted written testimony on May 8 in respect to EnergyNorth's request for approval. All three testimonies were highly critical of EnergyNorth's proposal and all three parties recommend that the agreement, as filed, NOT be approved. The key issues can be summarized as follows:

1. *EnergyNorth's stated "need" for an additional 65,000 dth is not supported by facts*
  - The experts testifying believe the actual need may be as low as 25,000 dth over current capacity.
2. *EnergyNorth did not adequately evaluate options other than NED*
  - Options including upgrade to the Concord lateral; buying gas on the open market during peak periods (as they do today); also, the Spectra and PNGTS projects were not adequately analyzed.
3. *EnergyNorth does not demonstrate that NED, as proposed, is the "best cost" or "least cost" solution for ratepayers and indeed may cost more than other options*
  - The experts comment that EnergyNorth fails to show how consumers will benefit from the project as proposed; indeed PLAN-NE's expert believes the net cost to ratepayers will be higher under NED than under other options.
4. *Current retail ratepayers carry the bulk of cost risk and burden*
  - Even though residential demand is expected to decline over time, and the additional gas is targeted for projected growth in commercial and industrial sectors, Liberty proposes to charge ALL customers for the cost of this pipeline project through a cost of gas adjustment mechanism.

I respectfully request that you do not approve the agreement between TGP and EnergyNorth. We are just beginning to deal with the stranded costs associated with the Merrimack Scrubber. Let's not add to the ratepayer burden with additional supply side solutions.

Sincerely,

Rep. Susan Emerson  
Cheshire County, Dist. 11