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Debra Howland, Executive Director and Secretary  
NH Public Utilities Commission  
21 S. Fruit Street – Suite 10  
Concord, NH 03301  
February 22, 2016

Re: IR15-442 **Petition for Approval of a Gas Franchise in Jaffrey, Rindge, Swanzey and Winchester**

Dear Ms. Howland,

I would like to comment on the misleading information being offered by Kinder Morgan and Liberty Utilities concerning transitioning from oil to natural gas heating.

KM's consultant report includes this statement,

"In addition to lowering emissions through renewable electricity, New England has a substantial—and long overdue—opportunity in the heating sector. New England still relies excessively on oil for heating, despite the fact that oil has nearly a third more carbon emissions than natural gas,<sup>60</sup> is generally combusted in less efficient equipment, and is usually significantly more expensive and imported from foreign countries. Approximately 87 percent of all U.S. residential fuel oil sales were to households in the Northeast in 2013, which consumed a staggering 3.2 billion gallons of oil just to heat homes (not businesses).<sup>61</sup> Such continued reliance should concern all consumer and environmental advocates, especially considering that the New England states received about \$343 million in Low Income Heating Assistance Program funding in 2015 and supported 424,000 low-income households in 2014.<sup>62</sup>"

The author freely mixes "Northeast" and "New England" so that the casual reader/listener thinks the paragraph is about New England. The "Northeast" includes the Mid-Atlantic states such as NY and PA. If you go to the eia website,

[http://www.eia.gov/dnav/pet/pet\\_cons\\_821usea\\_a\\_EPD0\\_VAR\\_Mgal\\_a.htm](http://www.eia.gov/dnav/pet/pet_cons_821usea_a_EPD0_VAR_Mgal_a.htm) "Adjusted Distillate Fuel oil sales for Residential Use," you will see that NY and PA (with all their pipelines and cheap gas and fracking wells) together consume more fuel oil than all of the New England states combined. NE uses about 40% of the heating fuel oil sold in the US. The rest of the regions in the country are moving to high efficiency heat pumps (electric power) and away from natural gas and fuel oil. You can find the graphic for this at the eia website

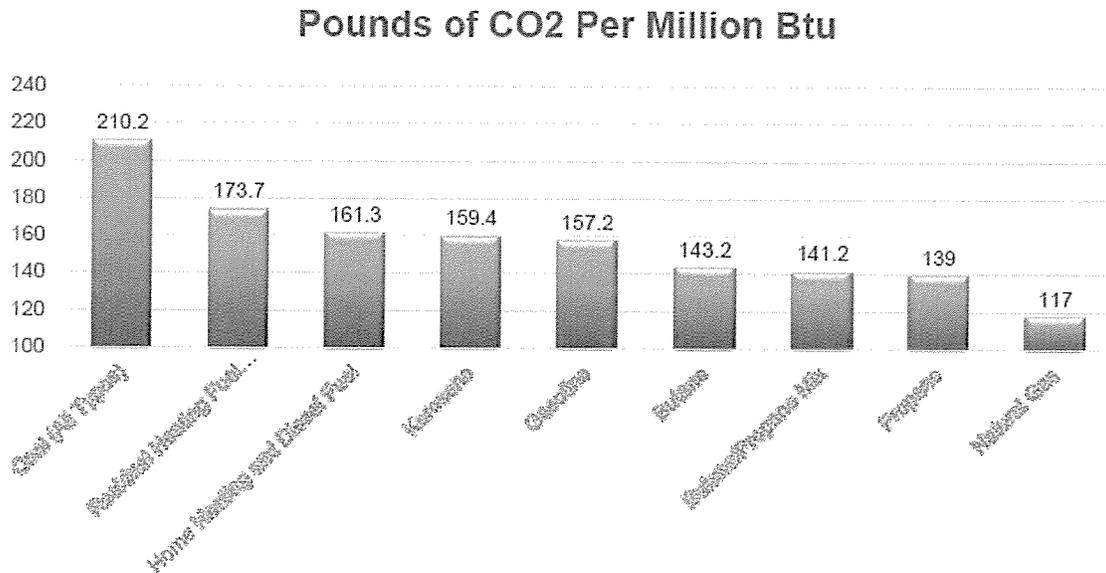
<https://www.eia.gov/todayinenergy/detail.cfm?id=18131> "Everywhere but Northeast, fewer homes choose natural gas as heating fuel." If they haven't transitioned NY and PA to natural gas for home heating, why would we think that New England is going to see such a benefit?

It is this kind of misleading information presented as "data" that makes it so hard to take anything Kinder Morgan says at face value.

In a presentation in the town of Winchester, NH, Liberty Utilities showed this graph intended to exaggerate the environmental benefits of natural gas over other forms of heating.

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# Natural Gas vs Other Fuels



Please note that the graph starts at 100 instead of zero, making it appear that natural gas is many times less polluting than other fuels. The numbers are correct, but the impression is definitely misleading.

There are many of these examples in the arguments presented by Kinder Morgan and Liberty Utilities in their efforts to impose their pipeline project on New England through misleading information and regulatory capture.

I urge you to deny their petition on the basis that they are using false promises and misleading information to garner support and demonstrate "need" to FERC.

Sincerely,

Patricia Martin