

November 20, 2018

Debra Howland
Executive Director
NH Public Utilities Commission
21 Fruit Street, Suite 10
Concord, NH 03301

RE: DG 17-068

NHPUC Safety Division Adequacy Assessment of the Proposed Compressed Natural Gas Installation by Liberty Utilities - Keene, NH Division October 3, 2018

Dear Director Howland,

NHPUC Safety Division's Assessment is an excellent report, a very thorough analysis of the Liberty Compressed Natural Gas proposal's numerous shortcomings. NHPUC Safety Division's outstanding work is a real credit to our state. The 171 detailed recommendations in the Assessment show the care taken by the staff to attempt to keep the public safe.

The fact that the Safety Division had to recommend SO MANY changes to Liberty's plans shows how appallingly slipshod Liberty's planning and preparation has been. They appear not to be taking seriously the risks of their proposal to convert their existing propane-air distribution system to compressed natural gas. Nor does Liberty seem to be interested in paying the costs of avoiding some of those risks.

One risk arises from the fact that propane-air is a wetter gas than natural gas. Liberty has 9 miles of cast iron piping where the Safety Division points out that seals will be at risk of drying out and leaking if the system is converted to natural gas. (page 61) The Division estimates it can cost approximately \$15.75 million dollars to replace the cast iron mains and attached services. (page 58) However, Liberty has not included those foreseeable costs with any future conversion plan. Such an omission is totally irresponsible.

Another irresponsible approach by Liberty was to design the compressed natural gas facility for a Class 1 or 2 less populated location than Keene, which is a Class 3 location requiring higher safety margins for piping and other components. Before the vigilance of the Safety Division prevailed, Liberty planned to use thinner-walled pipe for a facility that involves piping with pressures above 4,000 pounds, higher than interstate high-pressure pipelines. (page 9)

The Safety Division expresses misgivings about how Liberty "presents the plans as 'temporary' solutions rather than engaging in detailed planning from the onset that encompasses study of all the ramifications..." (page 4)

Liberty's casual attitude toward risk-taking raises serious doubts about whether this company is capable of taking on such a project safely. As a New Hampshire resident, I am very grateful for the careful work of NHPUC Safety Division.

I urge the Commission to require Liberty to fulfill ALL the detailed safety recommendations put forth in the Assessment. Please do not allow Keene to risk becoming like Lawrence, MA where lack of safety precautions by a gas company recently resulted in massive conflagrations and a death.

Thank you very much,

A handwritten signature in black ink, appearing to read "Liz Fletcher". The signature is written in a cursive style with a large, sweeping initial "L".

Liz Fletcher
288 Marcel Road
Mason, NH 03048

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