

STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION

Docket No. DG 17-152

LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.  
d/b/a LIBERTY UTILITIES

Least Cost Integrated Resource Plan

**Supplemental Filing in Response to Order No. 26,225 (Mar. 13, 2019)**

Liberty Utilities (EnergyNorth Natural Gas) Corp. (“EnergyNorth” or “the Company”), through counsel, respectfully submits the following response to the directive in Order No. 26,225 (Mar. 13, 2019) (the “Order”) for the Company to make a supplemental filing to more specifically address RSA 378:38, V, and VI, and RSA 378:39.

In support of this response, the Company states as follows:

EnergyNorth filed its Least Cost Integrated Resource Plan (“LCIRP”) in October 2017, addressing all the statutory factors of RSA 378:38 except for two factors that the Company thought did not apply to a natural gas distribution utility, RSA 378:38, V, and VI. *See* LCIRP at 57. The Order disagreed and asked EnergyNorth to substantively address those two factors and to provide the Commission with sufficient information to permit its assessment of the LCIRP’s “potential environmental, economic, and health-related impacts,” as follows:

Accordingly, we direct Liberty to submit a supplemental filing, including supporting testimony, to address each of the specific elements required under RSA 378:38 and RSA 378:39 that are not already addressed in its LCIRP, with adequate sufficiency to permit the Commission’s assessment of potential environmental, economic, and health-related impacts of each option proposed in the LCIRP, as required by RSA 378:39. Those specific elements are set forth in RSA 378:38, V and VI, and in RSA 378:39. We will review Liberty’s LCIRP and

the supplemental filing to determine whether it meets the public interest, consistent with all applicable statutory requirements.

Order at 7.

RSA 378:38, V, requires an “assessment of plan integration and impact on state compliance with the Clean Air Act of 1990, as amended, and other environmental laws that may impact a utility's assets or customers.” Subsection VI requires an “assessment of the plan's long- and short-term environmental, economic, and energy price and supply impact on the state.” RSA 378:39 states, in part, that when “deciding whether or not to approve the utility's plan, the commission shall consider potential environmental, economic, and health-related impacts of each proposed option.”

Through the attached testimony of William R. Killeen, the Company has addressed these statutory factors and has provided the Commission with sufficient information to determine the “potential environmental, economic, and health-related impacts” of the options available to the Company.

After evaluation of the Killeen testimony, the Company believes the Commission will be able to make its statutorily required assessment and approve the LCIRP.

Respectfully submitted,

LIBERTY UTILITIES (ENERGYNORTH NATURAL  
GAS) CORP. D/B/A LIBERTY UTILITIES

By its Attorney,



Date: April 30, 2019

By: \_\_\_\_\_  
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**Certificate of Service**

I hereby certify that on April 30, 2019, a copy of this supplemental filing has been electronically forwarded to the service list.



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Michael J. Sheehan