

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

DG 17-152

In the Matter of:

Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty Utilities

LEAST COST INTEGRATED RESOURCE PLAN

Direct Testimony

of

Al-Azad Iqbal
Utility Analyst – Gas & Water Division

September 6, 2019

Q. Please state your name, occupation and business address.

A. My name is Al-Azad Iqbal, and I am employed by the New Hampshire Public Utilities Commission (Commission) as Utility Analyst. My business address is 21 South Fruit Street, Suite 10, Concord, New Hampshire, 03301.

Q. Please summarize your educational and professional experience.

A. My educational and professional background is summarized in Appendix A.

Q. What is the purpose of your testimony in this proceeding?

A. My testimony addresses Staff's position regarding the adequacy of Liberty's filings with regard to the environmental assessment requirements in the statute.

Q. Please provide a brief history on how Liberty addressed the environmental assessment requirements.

A. In October 2017, Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty Utilities (EnergyNorth, or the Company) filed a Least Cost Integrated Resource Plan (LCIRP or Plan) pursuant to RSA 378:38. In its initial filing the Company did not address all statutory factors required to be assessed under RSA 378:38, V, and VI, as the Company believed that certain factors did not apply to natural gas distribution utilities.

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.”

On March 13, 2019, the Commission directed EnergyNorth to submit a supplemental filing to address certain statutory requirements not covered in its original filing.¹ Those requirements would allow the Commission to assess “potential environmental, economic and health-related impacts” of the LCIRP. Liberty submitted a supplemental filing that included testimony from William Killeen on April 30, 2019. On June 28, 2019, , pursuant to discussions during a technical session held on June 20, 2019, the Company filed additional supplemental testimony from Paul J. Hibbard, Sherrie Trefry, and Eric M. Stanley.

Q. What is Staff’s view on Mr. Killeen’s testimony?

A. Mr. Killeen provided the Company’s interpretation of the requirements of RSA 378:38 and described the Company’s analysis of the relative environmental and health related impacts of its Plan. After reviewing the testimony and participating in a subsequent technical session regarding the filing, Staff agreed with other parties that Mr. Killeen testimony did not address the issue adequately and suggested possible remedies.

Q. What was Staff’s view on the additional testimonies?

¹ New Hampshire Public Utilities Commission, Order No. 26,225, “2017 Least Cost Integrated Resource Plan, Order Denying Motion to Dismiss,” issued in Docket No. DG 17-152 on March 13, 2019

A. In response to the parties' concerns, the Company file additional testimony from Paul J. Hibbard, Sherrie Trefry, and Eric M. Stanley. Mr. Hibbard provided his analysis of the potential environmental, economic, and health-related impacts of each option proposed in the Company's LCIRP. Ms. Trefry addressed regulatory requirements concerning alternative options. Mr. Stanley addressed the Company's current energy efficiency efforts. After reviewing the additional testimonies, Staff believes that the Company has addressed the directives of Commission Order No. 26,225 adequately.

Q. What was Staff's conclusion on these issues?

A. Staff believes that the Company has addressed environmental as well as health related aspects in their supplemental filings at this time. Staff believes the information provided is responsive to the statutory requirements, given the absence of clear guidelines.

Q. Does that conclude your testimony?

A. Yes.