

**THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 17-198

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

**Petition to Approve Firm Supply and Transportation Agreements and the
Granite Bridge Project**

**CONSERVATION LAW FOUNDATION
PETITION TO INTERVENE**

The Public Utilities Commission (“Commission”) has initiated a proceeding to consider Liberty’s “petition (Supply/Transportation/Granite Bridge filing) for approval of contractual arrangements, and for Commission findings regarding the prudence of proposed investments,” including a delivered supply contract with ENGIE, a precedent agreement with Portland Natural Gas Transmission System, a proposed new in-state pipeline called the Granite Bridge Pipeline, and an on-system liquefied natural gas facility proposed to be located in Epping. In its February 8, 2018 Order of Notice, the Commission directed interested parties to seek intervention by March 7, 2018. Conservation Law Foundation (“CLF”) hereby petitions to intervene in the above-captioned proceeding, pursuant to the Order of Notice, N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32.

CLF states as follows in support of its petition for intervention:

1. CLF is a private, non-profit organization dedicated to protecting New England’s environment for the benefit of all people. CLF uses the law, science, and markets to create solutions that build healthy communities, sustain a vibrant economy, and preserve natural

resources, including resources affected by the generation, transmission, and distribution of electric power and the transportation and use of natural gas. Consistent with its mission to promote thriving, resilient communities, CLF advances sound clean energy policies that strengthen New England's—and New Hampshire's—economic vitality. CLF has approximately 5,000 members in New England, including over 530 members in New Hampshire, some of whom reside in the natural gas distribution territory of Liberty Utilities.

2. CLF's participation in Docket No. DE 17-198 will uniquely aid in the consideration of Liberty's petition. CLF has extensive expertise concerning natural gas, natural gas storage, and non-gas alternatives, as well as energy projects and markets. As a participant in the NEPOOL stakeholder process, CLF has participated in the formation and refinement of New England's energy markets and planning of the region's electric transmission grid. An active voting member of NEPOOL, CLF has represented its end-user sector in the ISO-NE Natural Gas Electric Coordination working group. CLF's expertise in the energy arena extends to, *inter alia*, natural gas and electricity coordination, natural gas energy efficiency and conservation, natural gas supplies, natural gas distribution infrastructure, greenhouse gas emission reduction requirements, electrification, grid modernization, and the economic and environmental impacts of natural gas pipelines.

3. CLF's substantial involvement in New Hampshire natural gas, energy efficiency, and other energy matters has spanned two decades. This involvement includes intervention in numerous dockets before the Public Utilities Commission, such as Docket Nos.: DR 97-211, DE 01-057, DE 07-064, DE 08-103, DE 08-145, DE 09-033, DE 10-160, DE 10-188, DE 10-261, DE 11-215, DE 11-250, DE 13-108, DE 13-275, DE 14-120, DE 14-238, DE 15-124, IR 15-124, IR 15-137, IR 15-296, DE 16-241, DE 16-693, DE 16-817, DE 17-124, and DE 17-136. CLF

has also participated in natural gas-related proceedings before numerous other state agencies in the region and the Federal Energy Regulatory Commission.

4. CLF and its members, including members who are Liberty gas customers, have a strong interest in ensuring that the facts of the agreements and capital investments proposed in this proceeding are fully aired, and that adequate consideration is given to potential alternatives, including non-gas alternatives that may entail lower costs and fewer environmental impacts. CLF and its members have an interest in ensuring that non-gas alternatives are given adequate consideration in part because natural gas is a major contributor to climate change and impacts the health and welfare of CLF's members and their children, as well as the resilience of the local economy. As New Hampshire, and New England more broadly, transitions away from excessive reliance on fossil fuels, fossil fuel expansion projects by regulated entities that may result in increased greenhouse gas emissions, reduced competition for clean energy, and/or stranded costs, should be subject to appropriate review. The contractual agreements and infrastructure projects proposed by Liberty in this proceeding are substantial in size and economic impact, entailing a major expansion of rate base and significant implications for competitive and regulated market participants.

5. Due to the significant impacts of the proposed projects, the rights, privileges, and interests of CLF and its members, particularly those who are Liberty gas customers and will consequently shoulder the costs of the proposed projects, will be substantially affected by the outcome of this proceeding.

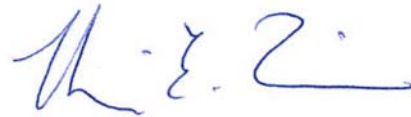
6. CLF furthermore respectfully submits that its intervention as a party in this proceeding is likely to elucidate important issues and facilitate an expeditious and just resolution of this proceeding, as a result of CLF's special expertise and experience.

7. CLF's participation is in the interests of justice and the orderly and prompt conduct of the proceeding. CLF's participation will neither delay nor disrupt this proceeding. The interests of CLF and its members are not adequately represented by any other party.

WHEREFORE, Conservation Law Foundation respectfully requests that the Commission grant its petition to intervene in Docket No. DE 17-198.

Respectfully submitted,

CONSERVATION LAW FOUNDATION



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Dated: March 6, 2018

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition to Intervene has, on this 6th day of March, 2018, been sent by email to the service list in Docket No. DE 17-198.



Melissa E. Birchard
Conservation Law Foundation