

December 3, 2018

Sent to: executive.director@puc.nh.gov

Debra Howland Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord New Hampshire 03301

Regarding PUC Hearing: DG 18-092 Gas Pipeline Drilling Ashuelot River

Dear Ms. Howland,

Please accept these late comments regarding the above hearing and decision before the Commission. I attended and signed in to the full hearing at the PUC on 11/26/2018 as a private citizen. As a member of the public I was asked at the end of the hearing if I had a comment to share. I really appreciate the invitation and opportunity. Please advise me if I can do anything else to ensure these comments are seen by the Commissioners in a timely manner.

I am writing to ask the Commission to hold Liberty to a reasonable standard of evidence, and reject the utility's arguments for urgency and need for this project.

By the utility's own admission, current service is sufficient to meet existing and expected demand. The existing West Street bridge crossing was serviced as recently as 2004, and the bridge is in good repair. The main pipe over that bridge is close to the end of its original design life but has no reported problems or leaks. In contrast, Liberty has miles of other pipes that are much older, and some that leak and need urgent refurbishment or replacement.

There are other reasons to reject this request.

- The utility's exhibits show the new pipe attaching directly to existing pipes as small as 4" in diameter. Flow through a 4" pipe is significantly limited compared to the existing 8" main. The project as presented has a significantly reduced profile and therefore cannot fulfill its goal of redundancy.
- Installing redundant new 50-year infrastructure into a system of miles of antiquated cast-iron pipes should be part of a comprehensive plan, not piecemeal.
- The safety of this project presumes need; if the project is not needed then the safest course is not to attempt the crossing.
- If it is the utility's intent to incorporate this crossing into a more regional system as mentioned, then it's approval should be part of a regional plan, and its costs spread among beneficiaries.

Thank you for accepting these comments, offered in light of the harrowing reports regarding climate change and the role of fossil fuels. Saddling energy consumers with the costs and environmental impacts of new 50 year fossil infrastructure should be done with extreme care.

Very respectfully submitted,

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