July 11, 2019
Debra Howland Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord New Hampshire 03301
RE: DG 17-198 Granite Bridge Pipeline and LNG liquefaction and storage facility Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities
RE: DG 17-152 Least Cost Integrated Resource Plan

Dear Ms. Howland,

Thank you for accepting my comments and questions regarding DG 17-152 and DG 17-198.

I have been following the Granite Bridge pipeline project and associated LNG storage facility that is proposed to be sited in Epping NH, and Liberty's Least Cost Integrated Resource Plan (LCIRP).

I am a member of Mothers Out Front in the Monadnock Region and share in their commitment to mobilizing for a livable future, and finding non-partisan solutions to the climate crisis. The latest IPCC report issues a challenge, that this is the time to be exploring alternatives and acting on climate solutions. This is the moment when we can shift the course, and veer away from the global instability of climate chaos.

If we are to have any hope of preventing extreme climate change, we need to put the brakes on fossil fuel expansion. This means that we need to fully explore all viable alternatives. There should be a comprehensive cost and environmental comparison of utility investment in weatherization, energy efficiency services, and renewable energy options to satisfy increased demand by utility customers in target areas. These non-pipeline alternatives could be financed and incentivized, just like any new pipeline infrastructure. NH would not be the first to do this. This year the NY PUC issued an RFP for trillions of BTUs of non-pipeline alternatives. Just next door, in MA, there is a bill called the FUTURE Act to replace leak prone gas pipe with water pipe to build a geothermal powered energy system.

The latest supplemental filing from Liberty mentioned that the Granite Bridge pipeline would decrease CO2 emissions, as customers switch from oil to gas. However, this filing did not include a conversion cost for fully implementing that switch. If this kind of comparison is being made, the comparison should be expanded to include the investment and cost, and payback over 10 years, and should cover a broader range of energy options including weatherization, efficiency, and renewables.

There is also a widespread misconception that natural gas is a more climate friendly energy choice. Natural gas does burn cleaner than oil, but the methane that escapes during extraction, processing, venting, and through leaks in pipeline infrastructure has a global warming potential that is 84 times that of CO2, and can persist in the climate for decades. It is not in our best interest to be expanding natural gas infrastructure.

I understand the need to maintain our existing pipeline systems, for safety reasons, but, similar to plans for replacing bridges and roads, these should be prioritized by least cost and severity.

At this time, when the biggest areas of economic growth are in solar and wind, and we're looking at the last decade in which to transform our energy system, it would be a failure for the PUC to green light the Granite Bridge Pipeline, without first performing an thorough examination of all of our alternatives.
As ratepayers we will be left paying the stranded costs for this project.

Sincerely,

Michelle Russell
89 Old Dublin Rd
Hancock NH 03449

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