



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

Docket No. DG 15-XXX

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities  
Winter 2015/2016 Cost of Gas Filing

**DIRECT TESTIMONY**  
**OF**  
**MARY E. CASEY**

August 28, 2015

1 **I. INTRODUCTION**

2 **Q. Please provide your name, job title and job description.**

3 A. My name is Mary E. Casey. I am the Environmental Program Manager for Liberty  
4 Utilities Service Corp. (“Liberty”). I am responsible for overseeing the management of  
5 the investigation and remediation of manufactured gas plant (MGP) sites for Liberty  
6 Utilities (EnergyNorth Natural Gas) Corp. (“EnergyNorth” or the “Company”) as well as  
7 operational environmental compliance, including air and waste permitting, wetlands  
8 permitting and protection and spill response.

9 **Q. Please describe your educational and professional background.**

10 A. I hold a Bachelor of Science in Chemical Engineering from Polytechnic Institute of New  
11 York, and a Master of Science in Civil/Environmental Engineering from Polytechnic  
12 University. I have been employed by Liberty since July 3, 2012, managing the  
13 investigation and remediation of MGP sites. Prior to my employment by Liberty, I held  
14 the position of Principal Environmental Engineer for National Grid and KeySpan Energy,  
15 with responsibility for operational environmental compliance.

16 **Q. What is the purpose of your testimony?**

17 A. The purpose of my testimony is to discuss the status of EnergyNorth’s site investigation  
18 and remediation efforts at various MGP sites in New Hampshire, to briefly describe the  
19 MGP-related activities performed by the various contractors and consultants, to discuss  
20 the costs for which the Company is seeking rate recovery, and to describe the status of  
21 the Company’s efforts to seek reimbursement for MGP-related liabilities from third

1 parties. My testimony is intended to update the information provided by the Company in  
2 prior cost of gas proceedings. The costs associated with these investigations and  
3 remediation efforts and certain of the amounts recovered from third parties are included  
4 in the schedules and other data prepared by Mr. Simek as part of the Company's cost of  
5 gas filing.

6 **II. STATUS OF INVESTIGATION AND REMEDIATION ACTIVITIES**

7 **Q. Please briefly describe the status of each of the Company's MGP sites.**

8 A. Consistent with past practice, the description of the status of investigation and  
9 remediation efforts at each site as well as the various efforts to recover the site  
10 investigation and remediation costs from third parties are summarized in materials  
11 included in the Company's filing. In addition, as previously ordered by the Commission,  
12 in August 2015 the Company held a technical session with the Commission Staff and the  
13 Office of Consumer Advocate to keep them apprised of the status of site investigation  
14 and remediation efforts, as well as cost recovery efforts against third parties.

15 **Q. In 2014, the Company began remediation of an area referred to generally as Lower**  
16 **Liberty Hill in Gilford. Please briefly describe the current status of the Company's**  
17 **remediation efforts at Lower Liberty Hill and any significant events over the course**  
18 **of the past year at that site.**

19 A. The Company began remediation activities at the Lower Liberty Hill site in 2014. Sixty-  
20 five percent (65%) of the impacted soil was removed during the first season. The site  
21 was graded and stabilized on December 21, 2014, for the winter. On April 8, 2015, the

1 Company presented the results of the first season of construction at a Gilford Town  
2 Select Board meeting, and presented expectations for the second season to the  
3 community. Starting on April 13, 2015, remediation of the north side of the site began.  
4 All of the tar-impacted soil was removed from the excavation on August 3, 2015. The  
5 project is expected to be completed and fully demobilized on September 23, 2015. There  
6 were a couple of minor complaints about odor and vibration during the first season that  
7 were immediately rectified, and the project has progressed with a perfect safety record  
8 and without disruption to the surrounding community.

9 **Q. Please briefly describe the current status of the Company's remediation work at the**  
10 **Manchester MGP.**

11 A. A Remedial Design Report for the on-site and off-site impacts was finalized and  
12 submitted to New Hampshire Department of Environmental Services (NHDES) on  
13 December 19, 2014. The on-site activities will include further investigation and  
14 remediation of areas showing localized contamination. The off-site design will involve  
15 installation of extraction and monitoring wells to continue monitoring any migration of  
16 contamination between the site and the Merrimack River.

17 **Q. Please briefly describe the current status of the Company's remediation work at the**  
18 **Concord MGP.**

19 A. The Groundwater Management Permit (GMP) application was submitted on September  
20 4, 2014, and the permit was received on December 1, 2014. On March 31, 2015,  
21 EnergyNorth submitted a proposed Remedial Action Plan (RAP) involving removal of

1 shallow soils displaying MGP-related residual impacts, investigation and remediation of  
2 remaining known subsurface structures, capping of components of the local storm water  
3 drainage system, site capping design, and continued monitoring of groundwater on the  
4 site. NHDES approved the RAP on May 29, 2015, with the condition that the roof of the  
5 brick gas holder either be restored, or the holder be razed and the soils beneath it  
6 remediated. Both options are being weighed presently. A Remedial Design Report is to  
7 be provided to NHDES by December 31, 2015, summarizing pre-design investigations to  
8 be completed in 2015.

9 The design for the remediation of the east side of I-93 (Concord Pond) is being finalized,  
10 incorporating the City's concerns regarding maintenance of the storm water outfall. We  
11 expect to review the design in the third quarter of 2015 with the City of Concord.

12 Schedule for implementation of the design will depend on approval of the design by  
13 NHDES.

14 **Q. Please briefly describe the current status of the Company's remediation work at the**  
15 **Nashua MGP.**

16 A. A RAP Summary, involving the asphalt capping of the area over Holder #2 and  
17 continued groundwater monitoring, was submitted on April 2, 2015. A Monitoring  
18 Summary and Progress Report were submitted by the Company on February 7, 2015.  
19 NHDES accepted the RAP Summary on April 10, 2015, with the provisions that the  
20 Company submit the draft Activity and Use Restriction (AUR) and final engineering  
21 design plan for the cap by September 15, 2015. These submittals are being prepared.

1 **Q. What other MGP investigation and remediation activity has the Company**  
2 **undertaken in the last year?**

3 A. No other MGP investigation and remediation activity has occurred in the last year.

4 **III. STATUS OF INSURANCE COVERAGE LITIGATION**

5 **Q. Have there been any recent significant developments in the Company's efforts to**  
6 **seek contribution from its insurance carriers in the past year?**

7 A. No. Insurance recovery efforts are complete with respect to all of the Company's former  
8 MGP sites.

9 **Q. What environmental remediation efforts do you anticipate for the remainder of**  
10 **2015 and in 2016?**

11 A. Completion of the remediation of the Lower Liberty Hill site will take place in the latter  
12 half of September 2015. At the Manchester MGP site, we will finalize the RAP, based  
13 on comments from the NHDES. The Company will commence remediation of localized  
14 areas of contamination on-site, and possibly the installation of monitoring and extraction  
15 wells on the off-site property. At the Concord MGP site, removal of shallow soils  
16 displaying MGP-related residual impacts, investigation and remediation of remaining  
17 known subsurface structures, capping of components of the local storm water drainage  
18 system, site capping design, and continued monitoring of groundwater on the site will  
19 take place. For the Concord Pond site, the Company will continue to work toward a final  
20 design for the remediation. At the Nashua MGP site, we are targeting 2016 or 2017 for  
21 paving to commence as part of the RAP design, upon approval by NHDES. All sites are

1 also now in the monitoring phase, so groundwater monitoring will occur at all of them  
2 under Groundwater Management Permits.

3 **Q. Does this conclude your direct testimony?**

4 A. Yes, it does.

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