

July 17, 2015

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

**Re: DG 14-380 Liberty Precedent Agreement**  
(Liberty Settlement Agreement or Instrument)

Dear Ms. Howland:

We are reminded that Liberty Utilities' (the Applicant) Settlement Agreement **Instrument** before the Commission is for future speculative gas approximately 3 years<sup>[1]</sup> away from any possible realization via the Kinder Morgan NED pipeline (2.2 Bcf/d); if it is consummated.

This is while new and significantly increased gas capacity is available now, additionally with current projects entering completion and equalizing prices between Regions.

Tradeoffs and concessions down to 100,000 dekatherms-per-day (0.097 Bcf/d -- *approximately 2269% smaller than currently proposed NED capacity*) in the humanly made Instrument, has shown abated need for the gas, yet still in exchange for identical unsubstantiated future marketing speculation, thus risk. Risk versus gas ratio has been made worse. It also shows missing need-based capabilities in the Request still perplexed by the Instrument even if the indisputable expert witness testimony is removed.

The NED pipeline has further direct consequences to consider for New Hampshire and the entire Region with the Request or Instrument in either situation requiring a new, 60 megawatts of power (80,000 horsepower) compressor station located within New Ipswich, NH (and another one of same-or-larger magnitude in Massachusetts) which is:

- exempt from Clean Air and Clean Water Acts (unlike a 60 megawatt power station with identical fuel and exhaust contingencies, likely required to adhere to these Acts, inclusive of noise pollution),
- one of the largest unprecedented stations East of the Mississippi, with Kinder Morgan publicly releasing misleading pictures and conflated information, erroneously and directly comparing this 80,000 horsepower compressor station to an actual 6,130 horsepower compressor station (without disclosing the "tiny" size) in Pelham, NH; **1305%** error!
- when coupled with 3-foot diameter pipeline technology (36" or even slightly smaller 30" contingency still near 3-foot diameter) for 71+ miles in New Hampshire, it is expected to directly impact (but is not limited to):

- private and municipal drinking water wells with adjacent mandated reservoirs
- protected conservation, private and public land
- watersheds and aquifers for human, and agricultural needs
- human life and quality of health

If NED is co-locating with "existing" right of ways (ROWs), then why is eminent domain needed [2]?

This is for new ROWs along 1 of 3 major 345,000 Volt transmission lines (33% of this grid) in all of Western New Hampshire<sup>[3]</sup>.

The abridged depictions above, show that Applicant's Instrument has far reaching risk and effects well beyond what is simply presented before the Commission. The Applicant is owned by Algonquin, a subsidiary of Kinder Morgan: Regardless if the Request or Instrument is seemingly incestual or creates an artificial market, the above, with irrefutable expert testimony before the PUC, renders the Instrument misaligned for New Hampshire and the Region.

We are reminded of, and appreciate 18 C.F.R. § 1c regarding market manipulation (future or present), or energy consumption inflation that includes precedent FERC scrutiny and fines.

With new excess capacity available NOW, we recommend the Commission

RENDER THE APPLICANT'S SETTLEMENT AGREEMENT INSTRUMENT AND/OR REQUEST, AS DENIED.

Respectfully Submitted,

C. Mack

Citizen of New Hampshire, Rate Payer, Technologist, Stake Holder

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[1]The Governor of New Hampshire, recently, wrote a letter to FERC requesting more scoping meetings and time for citizens which will likely push this time further into the future. With this uncertainty, how can the Applicant, the Commission or the Public know when this NED pipeline will be available to fill any need and what would that need be? Kinder Morgan has recently announced that they are changing the pipe size; it seems to be in flux just like the Applicant's speculation.

[2]Well known and heavily studied pipeline-to-electrical-transmission-line electromagnetic mutual coupling situations arising from standard physics and engineering makes co-location impractical and dangerous to the public. This is incontrovertible; remediation is not foolproof.

[3]Grid simulations show voltages out of tolerance when this line is compromised regardless of ring loops and tertiary 34.5 kV distribution; given Kinder Morgan's safety record, alleged

insolvency in the tens of billions, and convicted felonies, it is not improbable for a long-term compromising accident.

"Does that mean we do everything right and we don't have any incidents? No I'm not saying that." -- Allen Fore, NH Representative for Kinder Morgan when speaking in response to Kinder Morgan's safety record including the multitude of incidents since 2003; Interview aired on July 15, 2015.