August 19, 2016

Debra Howland, Executive Director
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite10
Concord, New Hampshire 03301-7319

RE: DG16-770

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty
Utilities and Concord Steam Corporation

Joint Petition for Approval of an Asset Purchase Agreement

Dear Ms. Howland:

Thank you for the opportunity to enter comments on the above referenced matter.

I had originally planned on attending the discussion of DG 16-770 scheduled for today, August 19th, however, my workload has changed significantly and I cannot leave work this afternoon. Therefore I am submitting these comments electronically on the docket.

In September of 2014, the New Hampshire Office of Energy and Planning (OEP) issued a "10 Year Energy Strategy" for the State. I draw The Commission's attention to the statements beginning on page iiii under the heading <u>Fuel Diversity and Choice</u>:

"Like other states in the Northeast, New Hampshire imports all of the fossil fuels used in the state....As demand for all fuels increases on a global scale, these challenges are not expected to ease, and overall prices are predicted to continue increasing. Now more than ever there is a need for focused efforts to reduce New Hampshire's vulnerability to price volatility and supply disruptions, and to expand our ability to be more flexible and resilient. Diversifying our fuel portfolio and increasing the use of in-state resources are critical tools in achieving those goals. Better utilizing New Hampshire's in-state resources will also provide an important economic boost, as it will allow more energy dollars to be retained in state rather than spent on imported fuels, and the industries involved with building and installing these systems increase economic activity."

My question regarding Liberty Utilities Asset Purchase request is a simple one. Would granting this request be in alignment with the "10 Year Energy Strategy" issued by the OEP only two years ago?

In reviewing the documents I see some major disagreements including:

- 1. We are already overly dependent on Natural Gas adding more is in opposition to the goal of fuel diversification
- 2. Natural Gas is imported, Biomass used to fuel Concord Steam is from my understanding- a local product of wood chips and forest debris.
- 3. Natural Gas is a fossil fuel and while prices are low now, they are subject to a volatile market including the pressure of export on local prices.

- 4. Biomass is a renewable energy resource it does not make sense to replace it with a fossil fuel and defeats both the goal of using in-state resources and the overall goal of fuel diversification and choice.
- 5. The production of wood chips and use of forest debris for Biomass provides local workers with jobs.

It would seem that allowing Concord Steam, a company who uses local resources and a renewable energy source and provides local employment to be replaced by Liberty Utilities, a company who will import fossil fuel to the area is in direct opposition to the goals stated in the 10 Year Energy Strategy. Therefore I am asking you to deny this request for Asset Purchase. The State of NH should renew its contract with Concord Steam providing them with the needed resources to go forward. The Asset Purchase is a bad deal for New Hampshire and one that locks us into decades of overdependence on fossil fuels.

Respectfully submitted,

Maryann B. Harper

Rindge, NH