

DG 16-770
9/6/16

Debra Howland
Executive Director
Public Utilities Commission
Fruit St.
Concord, NH
September 6, 2016

Dear Ms. Howland,

I am writing to urge state officials to take the time to seriously investigate all options before permanently investing in a long term conversion to heat provided by burning fracked gas. The PUC should deny the sale of Concord Steam to Liberty Utilities, as the sale will ensure and expedite that conversion.

It is no secret that the fossil fuel industry is a well funded and active lobby in state governments and it appears as though Liberty Utilities is bound and determined to grow their stake and influence in NH. Originally, the sales pitch focused the needs of business; now Liberty Utilities is acting as a cooperative "rescuer" because the state is in a jam. State buildings have thermal needs that must be met and Liberty Utilities is "Johnny on the spot" offering their product. Once again, further reliance on gas is being advanced in NH, while more and more evidence is emerging about the perils of fracking and the negative atmospheric consequences of using the extracted gas as a "bridge fuel." Additionally, the goals of New Hampshire's 10 Year State Energy Strategy from the OEP specify increasing the diversity of our state's energy portfolio, expanding efficiency measures, and increasing the use of home grown energy sources such as biomass, wind, hydro and solar. A permanent conversion to gas contradicts and stymies those goals. The PUC and OEP should not be working at cross purposes.

NH is a state known for frugality and economy, but there are times when "penny-wise, pound foolish" is the applicable maxim. While the Department of Administrative Services might have to temporarily contract with Liberty Utilities to supply steam heat generated by gas to state buildings, I urge DAS to simultaneously take the time necessary to investigate best engineering options, including energy efficiency, to find permanent solutions. Gas might ultimately be best used as secondary back-up rather than the primary source of heat. The by-products of burning fracked gas continuously are no less concerning than smog inversions, but they are invisible to the naked eye. The sale of CS to Liberty Utilities guarantees that harmful, unfiltered emissions from combusted gas will become ubiquitous in Concord.

An additional concern arises about long term gas supply. At the Technical Session representatives from Liberty Utilities stated that they only had adequate gas capacity contracts (adequate to cover all state, commercial and residential conversions) in place through the 2017 season, yet they are simultaneously pursuing expansion plans in the Hanover/Lebanon and Pelham/Windham areas and exploring expansion into Merrimack. During the Precedent Agreement testimony for NED, Liberty Utilities experts claimed they had insufficient gas capacity and could not expand unless they contracted for gas that NED would transport. NED is dead, and the Liberty's contract with Precedent Agreement contract was nullified. Now Liberty Utilities is trying to expand without any mention of where (apparently) necessary additional gas will come from after the 2017 season. That suggests a very cavalier attitude toward fulfilling service commitments. Or, perhaps the PUC and Liberty Utilities have privately discussed the possible approval of another 20 year Precedent Agreement contract with a different pipeline company, which leads to the perception, at best, of back room promises or decisions and/or procedural advantages....

This a costly and precedent setting decision, as it ultimately sets the stage for and requires a long term commitment to importing more gas into NH. Other potential options should be thoroughly explored; energy efficiency studies, designs and heating options should be pursued for every state building affected. Not doing so is an abrogation of clean energy leadership as taxpayers will have to live with and pay for the results of this change for several decades, at least. Temporary solutions may be more expensive in the short term, but could prove better for taxpayers and our living environment in the long term. Decisions made in panic and haste have long life spans and often produce regrettable consequences. Selling Concord Steam to Liberty Utilities effectively commits NH state government to decades of dependence on fracked gas as the sole source of heat in state buildings. Please deny the sale.

Thank you for considering my comments.

Marilyn Learner
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Cc: Vicki Quiram, Commissioner, DAS
Donald Kreis, OCA, PUC