

September 7, 2016

Debra Howland, Executive Director
New Hampshire Public Utilities Commission
21 S. Fruit Street
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 have been following the State's energy course since attending a public hearing given by Meredith Hatfield at the Nashua Community College where OEP solicited public input before finalizing the 10 Year Energy Strategy report. The strategy report checked some boxes, but left others ill-defined and most importantly, did little to relay an appropriate sense of urgency in redesigning our energy approach commiserate with the magnitude of the problem facing us in terms of climate disruption.

Intervenor Jordan Institute references the Efficiency and Clean Energy statute that defines 'clean energy improvements' and I was shocked to see that all the clean methods are now joined by 'or natural gas'. So our legislators have opted to ignore the science and take the marketing rhetoric that now allows the PUC to regard a fossil fuel source as playing the role of a clean energy source. This is sacrilege. How can we be expected to get anywhere in our quest for lower emissions if we include high emissions fuel sources, along with truly clean ones? This language was clearly included to support the increase of gas in replacing fuel that was perceived as dirtier (i.e. oil and coal). But that is not what is happening in practice. This bending of the definition of 'clean' is now facilitating the expansion of gas - which in most RSAs I have seen, is exempt from 'clean' energy lists. See RSA 53-F:1 below.

TOWNS, CITIES, VILLAGE DISTRICTS, AND UNINCORPORATED PLACES

ENERGY EFFICIENCY AND CLEAN ENERGY DISTRICTS

53-F:1 Definitions. – In this chapter:

I. "Clean energy improvement" means the installation of any system on the property for producing electricity for, or meeting heating, cooling, or water heating needs of the property, using either renewable energy sources, combined heat and power systems, or district energy systems using wood biomass (but not construction and demolition waste), waste heat, or natural gas. Such improvements include but are not limited to solar photovoltaic, solar thermal, wood biomass, wind, and geothermal systems, provided that, to be covered by an agreement with a property owner and financed under this chapter, such improvements shall be qualifying improvements under RSA 53-F:6.

The proposal for a gas provider to acquire a cleaner, renewable biomass generation plant and convert it to run on gas is a step backward in our clean energy efforts and I ask that you deny the request for this reason. In the entire 100 page Energy Strategy Report, clean electric power generation was represented only on page 10, where a graph showed that the 3 regional nuclear power stations were supplying over 30% of our electricity. These plants have run safely and reliably for decades with no harmful greenhouse

gas emissions and yet, there was no mention of plans for this clean power source. It appears all a fossil fuel company has to do is market its greenhouse gas emitting product as clean (which started as *cleaner*, but now they've just lopped off the 'er'), and we will give them priority over all other portfolio sources. I've even heard ads on NPR citing 'clean energy sources like Wind and Solar and Gas'. I sent a note asking them how the Petroleum Institute can get away with this deception. It appears we are living in dangerous times when facts are so easily side-lined in pursuit of profits. But some things don't change: the first rule in digging out of a hole is to stop digging. Our dependence on fossil fuels cannot be fixed by adding more fossil fuel to our clean energy projects. And this plan for conversions at every level, comes from industry, not scientists. So who is the public to trust if our regulators are beholden only to industry?

The US emits 10,000,000 tons of carbon per day. So pushing our emissions in the wrong direction when we have such a long way to go in extricating ourselves from our fossil fuel addiction, is something the PUC, the OCA and the DES should all be aligned in addressing. We are not living in normal times. We are living in times that require new thinking and bold action. What was the origin of our regional call for increased gas dependence when it means eliminating cleaner power sources (including base load nuclear power plants and the Concord Steam biomass plant). Here are some questions that need to be answered:

- **How did a fossil fuel become the go-to plan for converting cleaner and more renewable local energy sources?**
- **Who will bear the responsibility for that ill-fated decision? Ratepayers bear the risk.**
- **How much effort are consumers expected to expend to monitor PUC dockets and ISO/NE hearings in order to insure the balance of our energy portfolio is not overcome by the efforts of one industry trying to convince us that their product is clean in the face of all scientific evidence to the contrary?**

Economics has been the driver for our acceptance of more gas in New Hampshire and that cost factor has increased our reliance from 24% in 2000 to 56% today (and rising). But the OEP 10 year strategy report states that our portfolio diversity is what insulates ratepayers from the risk of price volatility. How do we mitigate that risk by continuing to grant conversion projects to gas companies so they can eliminate cleaner projects in favor of a higher dependence on fossil fuels? **What is our commitment to clean over cheap? and what does it need to be to protect consumers from artificially low prices that put cleaner energy partners out of business (like the recently relicensed Vermont Yankee - which cost southwestern NH millions in economic stimulus and 600 MWe of clean electricity)?**

Are we unwilling to admit increasing our gas reliance ignores that low gas prices are the direct result of gas being able to externalize the costs of the pollution it causes to our atmosphere (and earthly environs). This uneven playing field allows gas to increase our reliance on an unsustainable fuel source, causing greater risk to ratepayers from price volatility. We don't need a crystal ball to see this; it's the very reason we made major investments in nuclear power in the first place. We didn't choose nuclear because it was popular or easy, we chose it because it was a non-emitting power source. The only way we can favor converting cleaner operations to gas is by pretending the industry marketing is true and the science is false. The general public can be fooled by clever marketing - our regulators should not.

If our electric grid can be powered by a reliable, clean energy source and our buildings can be powered by sustainable, local resources why would we invest in converting these pieces of our energy portfolio to back to an unsustainable fossil fuel?

The only way to get a good outcome is make the playing field level not by price, but by emissions. How our energy sector has been duped into counting only 'the burn factor' of gas, and not the entire process is

baffling. No other energy source is counted that way, they are all assessed by EIA from inception to use - except for gas. We don't get any points for rhetoric when climate disruption takes us over a tipping point. In legal circles, it might be called willful blindness. But whatever the problem in government, we're past the point where you can act as though there are no consequences to our energy actions.

Energy portfolio diversity is a priority in New Hampshire and the region not for it's own sake, but for our sake. The portfolio diversity trajectory is supposed to service our need for cleaner energy solutions. Fossil fuels are not clean (no matter how much money they put into advertising to the contrary) and therefore, gas should be near the bottom of the list of what needs to be increased rather than in line to be combined with clean energy sources of every type, to ensure constant revenue streams.

Since gas needs are flat without the electricity sector, granting expansion plans to local gas suppliers like this Asset Purchase Agreement only serves to keep these dinosaurs viable. They are furthering the goal of increasing their market share in New Hampshire to serve the plan of replacing our clean power plants as soon as possible. If this happens, we will have done all the rest for not.

The gas industry's ability to separate the issues into small slivers for regulatory consideration benefits them, not the consumer. We count on our regulatory champions to recognize the overall arc of our energy decisions. Please deny this asset acquisition as the result will be a move away from clean energy sources and an increase of New Hampshire's emissions at the very moment when we must do our utmost to move in the opposite direction. Our portfolio diversity was built a piece at a time and can be lost in the same fashion, though far more quickly.

Please protect all our hard work as a state by rejecting this short-sighted petition to turn a clean site dirty. The magnitude of the problem we are facing receives precious little attention for the facts as they present. We look for good decisions from you in difficult times - times where many people ask for short term monetary answers, with little focus on the future. We cannot afford to follow the letter of the law when the laws have been written with lobbyists in mind. We need decisions based upon the context of climate change and the mounting science that says we are reaching a tipping point on the warming of our planet, sooner than expected.

A vote for this asset acquisition distracts from our stated energy strategy and supports the need for more gas being brought to the region - an objective that runs counter to the needs of New Hampshire. Please vote against this asset acquisition as it cannot achieve its goal - to promote further energy efficiency and clean energy for the buildings in question.

Thank you for your time and consideration.

regards,

Kat McGhee
Hollis, NH