



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

Docket No. DG 16-XXX

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities  
Winter 2016/2017 Cost of Gas

**DIRECT TESTIMONY**

**OF**

**MARY E. CASEY**

September 1, 2016

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1 **I. BACKGROUND**

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 2016 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. Please briefly describe the current status of the Company's remediation efforts at**  
16 **the Lower Liberty Hill site in Gilford and any significant events over the course of**  
17 **the past year at that site.**

18 A. The Company began remediation activities at the Lower Liberty Hill site in 2014. Sixty-  
19 five percent (65%) of the impacted soil was removed during the first season. The site  
20 was graded and stabilized on December 21, 2014, for the winter. On April 8, 2015, the  
21 Company presented the results of the first season of construction at a Gilford Town  
22 Select Board meeting, and presented expectations for the second season to the

1 community. Starting on April 13, 2015, remediation of the north side of the site began.  
2 All of the tar-impacted soil was removed from the excavation on August 3, 2015. A total  
3 of 2,662 truckloads hauling 93,502 tons of tar-impacted soil was removed and thermally  
4 treated. The project was completed and fully demobilized on September 24, 2015. A  
5 severe rainstorm that occurred on September 30, 2015, damaged the freshly graded site  
6 surface and washed away much of the seed. The site surface was repaired, and additional  
7 stabilization measures and winter rye seed were applied in October 2015. In May 2016,  
8 an additional seeding was done to complete the restoration. The project progressed with a  
9 perfect safety record and without disruption to the surrounding community.

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

12 A. A Remedial Design Report for the on-site and off-site impacts was finalized and  
13 submitted to NHDES on December 19, 2014. The on-site activities will include further  
14 investigation and remediation of areas showing localized contamination. The off-site  
15 design will involve installation of extraction and monitoring wells to continue monitoring  
16 any migration of contamination between the site and the Merrimack River. NHDES  
17 accepted the proposed remedial design, adding activities involving further investigation  
18 of historical Holder 3 and the on- and off-site drainage system. The company is  
19 preparing a plan to address NHDES' concerns. In August 2015, the developer of the off-  
20 site area between the Manchester MGP and the Merrimack River contacted the Company  
21 the day before they were to start driving piles for their three new apartment buildings.  
22 The Company began working with their construction team immediately to help address

1 any concerns if they encountered any MGP-related media during construction. The  
2 Company continues to coordinate with the developer as the project nears completion, and  
3 very little MGP-related impacts were encountered.

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

6 A. NHDES approved the Remedial Action Plan (RAP) submitted in March 2015 on May 29,  
7 2015, with the condition that the brick gas holder house either be restored, so as to act as  
8 a functioning cap, or razed and the soils beneath it remediated. Various small-scale  
9 investigation activities, including removal of shallow soils displaying MGP-related  
10 residual impacts, investigation and remediation of remaining known subsurface  
11 structures, capping of components of the local storm water drainage system, and  
12 installation of soil vapor probes were performed in December 2015. A Remedial Design  
13 Report (RDR) was submitted to NHDES on March 16, 2016, summarizing the remedial  
14 design investigations. The Company has met with City officials to discuss the options for  
15 the brick gas holder, as it works into the remedial design. In early 2016 the Company  
16 was approached by a commercial developer who is interested in purchasing the property  
17 and repurposing the holder house structure. Several site meetings have taken place with  
18 the developer, and EnergyNorth awaits receipt of their conceptual plan to develop a cap  
19 design that might accommodate it.

20 The design for the remediation of the east side of I-93 (Concord Pond) was finalized in  
21 early 2016, incorporating the City's concerns regarding maintenance of the storm water  
22 outfall. The Company presented the amended remedial design to the City in February

1 2016, and the City agreed to the design, along with a rigorous schedule toward a  
2 construction date in late summer 2017 when the pond area is driest. Since the City did  
3 not meet an early deadline to determine and communicate details regarding access to  
4 their storm water system, however, the projected implementation has been moved to late  
5 summer 2018.

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

8 A. The Company submitted the draft Activity and Use Restriction (AUR) and final  
9 engineering design plan for the cap, per the RAP provisions, in September 2015.  
10 Response from NHDES has not yet been received.

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

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

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

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

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

1 **Q. What environmental remediation efforts do you anticipate for the remainder of**  
2 **2016 and in 2017?**

3 A. At the Manchester MGP site, we will finalize the RAP, based on comments from the  
4 NHDES. The Company will commence remediation of localized areas of contamination  
5 on-site, and possibly the installation of monitoring and extraction wells on the off-site  
6 property. At the Concord MGP site, the Company will continue to have discussions with  
7 the developer that is interested in acquiring the site. Once the conceptual design for the  
8 site is made available the Company will explore cap designs, liability protections, and  
9 determine the Company's next steps, including possible follow-up with an associated cap  
10 design for NHDES approval. For the Concord Pond site, the Company will continue to  
11 work toward NHDES approval of the design for the remediation and related storm water  
12 system access issues. We will continue to target late summer 2018 for this remedial  
13 implementation. At the Nashua MGP site, we are targeting 2017 for paving to commence  
14 as part of the RAP design, upon approval by NHDES. All sites are also now in the  
15 monitoring phase, so groundwater monitoring will occur at all of them under  
16 Groundwater Management Permits.

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

18 A. Yes, it does.