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September 6, 2017

VIA E-MAIL

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

RE: DG 16-852
Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities
Petition for Expansion of Franchise to the Town of Hanover and City of Lebanon

Dear Ms. Howland:

Please file this letter as a public comment in the above-referenced docket, in supplementation of the August 3, 2017, August 4, 2017 and August 24, 2017 public comments that I previously submitted in this matter.

In addition to those reasons stated in my prior comments as to why Liberty Utilities' petition runs counter to the New Hampshire Energy Policy codified under [R.S.A. 378:37](#), please consider the following.

[R.S.A. 378:37](#) demands that we diversify our energy sources. Former Governor Hassan emphasized the importance of adhering to this policy, particularly with respect to renewable alternatives, as she herself urged, in a public comment filed in Public Utilities Commission ("PUC") [Docket No. DE 16-241](#) concerning approval of the proposed Access Northeast gas pipeline, that:

"I strongly encourage the Commission to take a broad view and thoroughly review and examine the costs and benefits of this proposal in contrast to other alternatives, including increasing small-scale renewable energy generation and increasing investments in cost-effective energy efficiency."

[See page 1 of former Governor Hassan's letter.](#)

Former Governor Hassan has also specifically noted the importance of opting for renewable solutions over gas in terms of climate change and other fracked gas concerns:

“ ... the fracking process can leak methane and can contribute to carbon emissions and, therefore, global warming ... I think it’s very important that we take that into consideration in that it seems natural gas may not be as clean as people thought it was prior. And that should inform all policymakers.”

[See August 29, 2016 commwealthmagazine.org article.](#)

The former New Hampshire Office of Energy and Planning (“OEP”)¹ would certainly disagree that the approval sought here promotes the energy diversification required under [R.S.A. 378:37](#). The [“New Hampshire 10-Year State Energy Strategy”](#), issued by the OEP just three years ago this month, focuses, instead, on cleaner, renewable sources of energy (and energy efficiency). Moreover, with respect to the Public Utilities Commission (“PUC”) Staff’s “Report on Investigation into Potential Approaches to Mitigate Wholesale Electricity Prices,” issued in Commission [Docket No. IR 15-124](#) on September 15, 2015, the OEP concluded:

“ ...OEP is concerned that the report falls short by focusing only on natural gas investments and ignoring the challenges the region faces as our fuel mix becomes less diverse. Investing in more natural gas infrastructure could lead to even more reliance on natural gas. However, **increasing reliance on one fuel, namely natural gas, is what caused the wholesale price spikes in the winter of 2013-2014 in the first place ...**”

[See page 2 of OEP letter](#) (emphasis added).

[Gas reliance is currently approaching 60%](#) . Are we trying for 80%? 100%? **How “cheap” will gas be for New Hampshire when gas starts to run out, but we have no alternative but to keep buying it as everything depends on gas?**

Gas will run out—look no further than the petitioner’s own prior testimony. Less than two years ago, in then pending PUC [Docket No. DG 14-380](#) concerning approval of the Northeast Energy Direct (“NED”) pipeline, Liberty Utilities warned of huge supply deficiencies going forward, without even factoring in the gas needed for the Pelham/Windham, Concord Steam, etc. expansion approvals that the petitioner has received subsequently. Indeed, Liberty Utilities’ testimony in PUC [Docket No. DG 14-380](#) represented that “Table II below provides a design day comparison of the Company’s current resource portfolio and the updated design day demand forecast provided previously ...”:

¹ Since renamed the “New Hampshire Office of Strategic Initiatives.”

Table II

Year	Design Day Resources	Design Day Demand	Reserve/(Deficiency)
2014/15	155,033	146,968	8,065
2015/16	155,033	153,155	1,878
2016/17	155,033	157,039	-2,006
2017/18	155,033	160,686	-5,653
2018/19	155,033	164,526	-9,493
2019/20	155,033	167,773	-12,740
2020/21	155,033	171,229	-16,196
2021/22	155,033	174,088	-19,055
2022/23	155,033	176,851	-21,818
2023/24	155,033	179,790	-24,757
2024/25	155,033	182,421	-27,388
2025/26	155,033	184,768	-29,735
2026/27	155,033	187,295	-32,262
2027/28	155,033	189,944	-34,911
2028/29	155,033	192,341	-37,308
2029/30	155,033	194,851	-39,818
2030/31	155,033	197,886	-42,853
Year	Design Day Resources	Design Day Demand	Reserve/(Deficiency)
2031/32	155,033	200,609	-45,576
2032/33	155,033	203,366	-48,333
2033/34	155,033	206,238	-51,205
2034/35	155,033	209,190	-54,157
2034/36	155,033	212,101	-57,068
2036/37	155,033	214,790	-59,757
2037/38	155,033	217,519	-62,486

Following the above Table II, Liberty Utilities’ testimony concluded with:

“As shown in Table II above, [Liberty Utilities] reaches a deficiency in resources as 2 compared to its design day firm customer needs as early as the winter of 2016/17.”

[See Table II and related testimony on pages 16-17](#) (emphasis added).

Liberty Utilities is ensuring higher gas prices, by ensuring shortages. Over-reliance on gas will kill us, and is completely contrary to diversity requirements of R.S.A. 378:37.

Two other quick points in closing ...

First, for those who doubt the connection between the approval sought in this proceeding and the call for a new high-pressure gas pipeline ripping through New Hampshire, think again. In its statement touting the purported “benefits” of the NED pipeline, Kinder Morgan argued:

"NED would enable the development of more CNG and LNG facilities in New Hampshire, and residents and businesses could realize the economic benefits of a less expensive fuel source for transportation. "

[See Kinder Morgan statement](#). The approval sought here paves the way for a new pipeline, plain and simple.

Second, climate change is clearly irrefutable at this point, and the proper subject of administrative notice. With good reason: climate change is *science*, and, as noted by NASA:

["Multiple studies published in peer-reviewed scientific journals show that 97 percent or more of actively publishing climate scientists agree: Climate-warming trends over the past century are extremely likely due to human activities. In addition, most of the leading scientific organizations worldwide have issued public statements endorsing this position."](#)

For a partial list of these resources, please [click here](#). [The “scientific evidence ... is unequivocal”](#) and, as more than 2,300 scientists—including **22 Noble Prize winners**—have urged, [science must be respected](#). How can we say that the same field of professionals and sphere of intellect that we have relied on to take us to the outer reaches of our galaxy cannot be trusted to understand basic processes of our own planet—especially when [NASA’s own scientists agree that climate change is real?](#)

It is not too late to save our planet, but, to have any chance, state agencies such as the PUC must get very serious, very quickly, about addressing the problem. Please start here.

Sincerely,

[//s//Richard M. Husband](#)

cc: Concerned citizens