

March 6, 2021

VIA ELECTRONIC DELIVERY

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

RE: DG 17-152

Liberty Utilities (EnergyNorth Natural Gas) Corporation dba. Liberty Utilities
Least Cost Integrated Resource Plan

Dear Ms. Howland,

I am writing to the Public Utilities Commission on DG 17-152 out of concern for several procedural issues that appear to be moving the LCIRP process further from its intended objective. My understanding of the original intent of instituting a least-cost, integrated resource planning process was to support New Hampshire's desire to move away from investing in utility infrastructure that was both costly to ratepayers (stranded costs, i.e. the scrubber) and discordant with the state's energy goals, over time. Enlisting the utilities as partners in the process, the idea was to have them provide the Public Utilities' Commission with an honest assessment of the options available to best address our energy needs in the context of realistic constraints. Environmental concerns are among the realities with which the state much deal and are therefore central to the notion of the LCIRP, rather than tangential.

Although the original statute was configured prior to the deregulation of the utilities' market, the effort to continue requiring the LCIRP in practice for new energy projects was kept in place for the benefits it was designed to derive. It appears in this docket, that the analysis by Liberty Utilities includes only the plan they have on offer, rather than an honest discussion of best-case scenarios for cost and environmental outcomes on the range of options available to solve the given-problem. That makes Liberty's LCIRP response instructive for the times in which we operate. The continued practice of deflecting discussion of clean vs. cleaner alternatives and the habit of delaying meaningful action on our emissions efforts, paves the way to the most-costly outcomes as we kick the can to the end of a finite road. It runs counter to spirit of Least-Cost Integrated Resource Planning.

Any plan that cements higher fossil fuel dependence is clearly not consistent with the intent of LCIRP. How can ignoring the cost of upgrades to more efficient, clean technologies be excluded from a discussion of home heating planning, when this is the most stubborn sector under consideration for moving off our emissions' curve? How can the question of emissions pollution be avoided when it is so central to consumer cost and environmental havoc? When there are clean alternatives, like electric heat pumps, to be considered when a per unit investment in a home-heating energy source conversion project is under review, how can the contrast of overall cost and environmental benefit be left out of the LCIRP? It might be a lot cheaper to convert homes once to ground source heat than to build new fossil fuel infrastructure and incur the costs of resulting climate impacts on Granite Staters. I was under the impression that the LCIRP was the method we use to help make those decisions in this time of transition. In fact, the desire to continue pretending we are not required to transition is what seems to be missing in our planning and I am hopeful that centralizing energy planning will aid in this regard.

As Patricia Martin, Chair of the Rindge Energy Commission, comments relative to Mr. Hibband's analysis for the Granite Bridge project in her July 14, 2019 letter:

"If gas produces 27% less CO2 emissions than heating with oil, what would the statewide impact be if 37,000 homes converted from oil to fracked gas? There are roughly 700,000 households in NH, so 37,000 conversions would be approximately 5.3% of the total. That means the statewide impact would reduce GHGs $.053 * .27 = 1.4\%$. Over a 20-year period, this is clearly not a sufficiently high percentage to combat the climate crisis.

Mr. Hibbard might have compared the two options (Granite Bridge versus Concord Lateral) with the benefit of weatherizing 74,000 (at \$6000 each) existing customer homes to a 20% reduction in fuel use resulting in a 2.1% statewide reduction in GHGs. While this still wouldn't be enough in the long term to combat our climate crisis, it would free up 10% to 20% of existing supply to meet customer needs and return immediate, demonstrable savings to customers.

Given that the Intergovernmental Panel on Climate Change (IPCC) reports that we have about 10 years to transition away from fossil fuels, Liberty's LCIRP must include clear goals for decarbonizing completely by 2050 or sooner. Utilities in other states are studying district hot water heating systems using utility."

As Government officials, I fear we are far-too-willing to allow this critical time to elapse while we rely on norms and protocols that will do nothing to save the ratepayer, or the citizen, from the costly climate disruption that is already in evidence in our state, around the nation, and around the globe. Every opportunity to force innovation and efficiency must be taken and utilities must step up their efforts to include cost comparisons for clean energy alternatives in every LCIRP filing. We don't get a do-over and the science of the coming crisis is advancing to a point where no response will suffice. Our collaborations can no longer glance at the environmental portions of the statute because they appear to have been written without the requisite urgency. No law is ever perfect, but climate science is settled.

Every PUC collaboration is either helping us blunt the effects of climate disruption or missing the opportunity to eliminate emissions rapidly and dramatically within the next 25 years.

Without a change in attitude towards the role of the utilities in helping the state meet this moment to arrest harmful GHG pollution, we will be aligning our energy future with unsustainable, carbon emitting fuel sources as a dominant segment of our energy portfolio. Gas is not unsustainable because it is in scarce supply. It is unsustainable because if we keep removing it from the ground for use into the future, we will be intensifying species extinctions, coastal flooding, storms, tornadoes, rain events, droughts and forest fires that are also drivers of cost in the choices we make on behalf of our citizens today.

I ask that you require a new LCIRP filing for DG17-152 from Liberty Utilities that puts the urgency of the environmental crisis New Hampshire residents face front and center in the analysis and the proceeding that results. If we are not operating on the same assumptions for what is included in a 'least cost' plan mid-way through 2021, then we may very well end up spending far more than any of us intend by continuing a business as usual lens.

There is no other way to keep the citizens of the state safe without acknowledging the reality of the science and partnering with our utilities and other energy stakeholders to come up with new approaches that meet our clean energy needs. This does not mean we do not have gas as part of the energy mix, but it does mean that unless gas finds a way to become net zero (for real), its role as a bridge that leads to greater fossil fuel dependence in the NH energy portfolio must be limited. As we move energy segments toward beneficial electrification, we must simultaneously maintain the stability of our grid and support aggressive integration plans that allow for investments in local, sustainable and net-zero sources to

stabilize consumer costs through load shaving and the ease of peak demand. The continued resistance to actually planning for what is a de-carbonization imperative will make the entire effort more painful and more costly. I think that is the opposite of our objective in doing the work that we have committed to do.

Thank you for your time and consideration,

Regards,

Kat McGhee, M.Ed., PMP
New Hampshire State Representative
Deputy Ranking Member
Science, Technology & Energy Committee
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