

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

Docket No. DG 17-152

**LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.,
d/b/a LIBERTY UTILITIES**

Least Cost Integrated Resource Plan

CONSERVATION LAW FOUNDATION'S SUMMARY OF POSITION

NOW COMES the Conservation Law Foundation (“CLF”), an intervenor in this docket, and submits the following summary of its position in the docket, pursuant to the order of the New Hampshire Public Utilities Commission (“Commission”), dated March 16, 2022, instructing the parties to file summaries of their position and any additional filings by June 1, 2022, and scheduling a status conference for June 21, 2022.

I. Background

This long outstanding matter raises important issues regarding the proper application of New Hampshire’s least cost energy planning laws to the investment decisions made by Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty Utilities (“Liberty”) It also concerns whether Liberty’s Least Cost Integrated Resource Plans (“LCIRPs”) function as mere reporting forms, or instead, serve their intended purpose under New Hampshire law of “allow[ing] the Commission the opportunity for input regarding [Liberty’s] current planning processes, procedures, criteria, and planned investments.” *Public Service Company of New Hampshire d/b/a Eversource Energy*, DE 19-139, Order No. 26,362, at 8 (N.H.P.U.C., June 3, 2020).

Liberty initiated this matter on October 2, 2017, when it filed its LCIRP for the period from November 1, 2017, to October 31, 2022. Thereafter, CLF, the Pipeline Awareness Network

for the Northeast, Inc. (“PLAN”) and Terry Clark petitioned to intervene in the docket, which the Commission granted. Based on its recognition that the then proposed, and now-abandoned, Granite Bridge Project, was highly relevant to Liberty’s least cost integrated resource planning, the Commission approved parallel procedural schedules for the instant docket and the Granite Bridge Project docket, DG 17-198.

On May 15, 2018, Terry Clark moved to dismiss Liberty’s LCIRP on the ground that the filing failed to comport with the New Hampshire statutes governing LCIRPs, RSA 378:37-378:40. The Commission denied Mr. Clark’s motion; however, in ruling on the motion, the Commission concluded that Liberty had “overlooked” the Commission’s instruction in Order No. 25,762 that Liberty “address *all of the statutory elements of RSA 378:38 and RSA:39 in its plan development in a granular way*, so that reviewing parties may track the correspondence of the plan with the relevant statutory standards.” Order No. 26,225, at 6 (March 13, 2019) (emphasis added) (quoting *Liberty LCIRP*, Order No. 25,762 (February 9, 2015)). Accordingly, the Commission directed Liberty to:

[S]ubmit a supplemental filing, including supporting testimony, to address each of the specific elements required under RSA 378:38 and RSA 378:39 that are not already addressed in its LCIRP, with adequate sufficiency to permit the Commission’s assessment of potential environmental, economic, and health-related impacts of each option proposed in the LCIRP, as required by RSA 378:39.

Order No. 26,225, at 7 (March 13, 2019). The Commission explained that “those specific elements are set forth in RSA 378:38, V and VI, and in RSA 378:39” and that it would “review Liberty’s LCIRP and the supplemental filing to determine whether it meets the public interest, consistent with all applicable statutory requirements.” *Id.*

Liberty then submitted a supplemental filing that consisted of direct testimony from William Killeen. However, as argued by CLF in a motion filed in opposition, the supplemental filings failed to comply with New Hampshire’s LCIRP statutes, as well as the Commission’s March 13, 2019 order. In particular, CLF maintained that Liberty’s supplemental filing contained “no meaningful or detailed analysis of the public health, environmental, or economic impacts of its plan,” and, that Mr. Killeen lacked knowledge, skill, and experience in such subjects and, therefore, was unqualified to testify on them. CLF Motion, at 5 (May 10, 2019). CLF also asserted that Mr. Killeen’s testimony failed to compare the impacts from gas expansion to other resources, including “any data to compare the impacts of gas expansion to the impacts of electrification, demand reduction such as energy efficiency, oil usage, or some mixture of these other resource.” *Id.* at 6.

Liberty subsequently filed a second supplemental filing, which CLF again challenged. CLF argued that it was untimely because it was filed two months after the deadline established by the Commission and, more importantly, that it did not cure the previous deficiency because it failed to “compare gas expansion to any other resource options, including enhanced energy efficiency and electrification, or to evaluate the extent to which gas demand could be reduced to defer or eliminate the need for massive capital investments.” CLF Motion, at 1-2 (July 15, 2019). CLF also contended that the Commission should not approve any major projects proposed by Liberty until an LCIRP was submitted that integrates alternatives and impacts analyses into Liberty’s resource decisions. *Id.* at 2-4.

The Commission denied CLF’s motion but stated that the docket would proceed and that it would “determine whether Liberty has met its burden of proving the adequacy of its LCIRP based on the evidence presented at hearing, including not only the testimony presented by

Liberty, but also the testimony presented by other parties.” Order No. 26,286, at 6 (August 12, 2019). The Commission concluded that it would “consider any alleged deficiencies in Liberty’s LCIRP through an adjudicative process and at hearing” and would “determine whether the plan should be approved at the end of the proceeding, based on the record.” *Id.* at 6-7. Subsequently, CLF, Mr. Clark, and the Office of Consumer Advocate filed testimony in this docket.

Thereafter, due to a development in the now-abandoned Granite Bridge Project that Liberty asserted affected its LCIRP, Liberty requested to suspend the LCIRP docket, including the scheduled hearing dates, which the Commission granted. Since then, no meaningful action has occurred in the Liberty LCIRP docket.¹

II. Discussion

A. Liberty’s LCIRP Plan and Supporting Testimony Violate the LCIRP Statutory Requirements and Commission’s Orders on LCIRPs.

Liberty’s LCIRP plan and supporting testimony violate the LCIRP statutes. In particular, Liberty’s assessments of the environmental and public health impacts of its plan and assessment of demand-side energy management programs, including energy efficiency, fail to comply with the statutory requirements governing LCIRPs, RSA 378:37-378:40, as well as the Commission’s directives in this and other dockets governing LCIRP filings.

Pursuant to RSA 378:37, the New Hampshire General Court has declared as follows:

[I]t shall be the energy policy of this state to meet the energy needs of the citizens and businesses of the state at the lowest reasonable cost while providing for the reliability and diversity of energy sources; to maximize the use of cost effective energy efficiency and other demand-side resources; and to protect the safety and health of the citizens, the physical environment of the state, and the

¹ In response to a request by Liberty for a technical session to provide an update on the Granite Bridge Project, the Commission scheduled a parallel technical session for the Liberty LCIRP and Granite Bridge dockets for June 3, 2020; however, this technical session only indirectly addressed Liberty’s LCIRP and did not address the substance of Liberty’s LCIRP filings. *See* Secretary Letter, DG 17-152 (N.H.P.U.C., May 26, 2020).

future supplies of resources, with consideration of the financial stability of the state's utilities.

Under this policy, utilities' LCIRPs "shall include," *inter alia*:

- I. A forecast of future demand for the utility's service area.
- II. An assessment of demand-side energy management programs, including conservation, efficiency, and load management programs.
- III. An assessment of supply options including owned capacity, market procurements, renewable energy, and distributed energy resources.
- ...
- V. An assessment of plan integration and impact on state compliance with the Clean Air Act of 1990, as amended, and other environmental laws that may impact a utility's assets or customers; and
- VI. An assessment of the plan's long- and short-term environmental, economic, and energy price and supply impact on the state.

RSA 378:38. Further, in deciding whether to approve the utility's plan, the Commission must, as a matter of law, "consider potential environmental, economic, and health-related impacts of each proposed option." RSA 378:39. Importantly, in instances where the Commission "determines the options have equivalent financial costs, equivalent reliability, and equivalent environmental, economic, and health-related impacts, the following order of energy policy priorities shall guide the commission's evaluation: I. Energy efficiency and other demand-side management resources; II. Renewable energy sources; III. All other energy sources." *Id.*

1. Liberty Has Failed to Adequately Assess the Public Health and Environmental Impacts of Its Plan.

In its pre-filed testimony, Liberty compared the environmental and public health impacts of its two preferred natural gas options, the Granite Bridge Project and Concord Lateral Expansion options, to a status quo situation of continued reliance on heating oil and propane for

Liberty's projected future customers. *See* Direct Testimony of Paul J. Hibbard, at 13 (June 28, 2019). However, Liberty failed to analyze the environmental and public health impacts of its two preferred options, *when compared to non-gas/non-pipeline alternatives*, like increased energy efficiency or strategic electrification through increased heat pump use. Liberty also failed to address the greenhouse gas emissions implications and climate change impacts of its natural gas expansion plans. *See* Direct Testimony of Paul Chernick for CLF, at 4, 10. Thus, even though natural gas emits greenhouse gases that contribute to climate change and methane, the major component of natural gas, is an especially potent greenhouse gas (*see* Direct Testimony of Paul Chernick for CLF, at 10; Direct Testimony of Elizabeth A. Stanton for CLF, at 13-14), Liberty implausibly claims that its preferred gas options would reduce greenhouse gas emissions. *See* Direct Testimony of Paul J. Hibbard, at 28-29 (June 28, 2019).

By only comparing its preferred gas options to the status quo scenario of continued reliance on heating oil, and not to lower emissions heating alternatives, such as heat pumps or increased energy efficiency, Liberty failed to conduct a full analysis of the plan's short-and long-term environmental and health impacts as required by the LCIRP statutes. Liberty should have provided baseline data on the environmental and health-impacts of its gas expansion plans, as well as reasonable alternatives, including electrification, increased energy efficiency or demand reduction, or a reasonably projected mix of these resources. Liberty also should have evaluated how increased reliance on natural gas in New Hampshire, instead of cleaner alternatives like heat pumps, will result in greenhouse gas emissions that contribute to climate change.

By providing such narrow and limited assessments of the public health and environmental impacts of its plan, Liberty failed to address "the long-and short-term environmental . . . impact on the state" and failed to provide sufficient information for the

Commission to determine that the plan ensures that the energy needs of the state will be met while “protect[ing] the safety and health of the citizens [and] the physical environment of the state.” RSA 378:37, RSA 378:38 (VI).² Liberty’s failure to provide the required analyses prevents the Commission from fully considering “the potential environmental, economic, and health-related impacts of each proposed option,” as required by RSA 378:39.

2. Liberty Has Failed to Adequately Assess Demand-Side Alternatives, Like Energy Efficiency, as Alternatives to Its Natural Gas Expansion Plans.

Liberty’s LCIRP also violates the provisions in the LCIRP statutes governing demand-side resources and energy efficiency, and particularly the requirements that Liberty submit an “assessment of demand-side energy management programs, including conservation, efficiency, and load management programs,” RSA 378:38(II), and that its LCIRP align with the state energy policy of “maximiz[ing] the use of cost effective energy efficiency and other demand-side resources.” RSA 378:37.

It is noteworthy that in 2014, the General Court amended a prior version of RSA 378:37 to specifically establish, for the first time, that it is the state’s energy policy to “maximize the use of cost effective energy efficiency and other demand-side resources.” PUBLIC UTILITIES—ELECTRICITY—ENERGY CONSERVATION, 2014 New Hampshire Laws Ch. 129 (H.B. 1540). The 2014 legislation also added language in RSA 378:39 that requires the Commission to prioritize “energy efficiency and other demand side-management resources” when evaluating different options proposed by utilities. *Id.* Thus, by amending these statutes, the legislature

² While CLF mainly focuses on Liberty’s failure to fully address the environmental and public health impacts of its plan, Liberty also did not evaluate whether non-gas alternatives, such as heat pumps, could meet “the energy needs of the citizens and businesses of the state at the lowest reasonable cost” and increase “the reliability and diversity of energy sources.” RSA 378:37.

signaled its intention for energy efficiency and other demand-side resources to play as essential a role in accomplishing the state's energy needs as the other policies outlined in RSA 378:37.

However, in its LCIRP and supporting testimony, Liberty only analyzed its two preferred gas expansion options, and did not evaluate whether it could meet its customers' needs through increased demand-side alternatives and whether cost-effective demand side alternatives, like increased energy efficiency, could result in the least cost option. Although Liberty analyzed the energy efficiency savings from the programs that were approved as part of the 2018-2020 New Hampshire Statewide Energy Efficiency Plan ("Triennial Plan"), Liberty did not analyze whether efficiency savings above and beyond the Triennial Plan could satisfy Liberty's resource requirements. *See* Liberty LCIRP at 3, 9, 23-24, 56 (Oct. 2, 2017); Direct Testimony of Eric M. Stanley, at 2, 4 (June 28, 2019).

RSA 378:37 does not provide that it is the energy policy of the state to meet energy needs of the state with only natural gas options; rather, it specifically establishes "maximizing energy efficiency and other cost-effective demand-side resources" as equivalent to meeting the state's energy needs through traditional gas options. RSA 378:37. Liberty's failure to fully evaluate energy efficiency and other demand-side alternatives ignored this policy. As a result, Liberty has prevented the Commission from ensuring that Liberty's LCIRP actually meets the "energy needs of the citizens and businesses of the state at the lowest reasonable cost," RSA 378:37, and deprived the Commission of the ability to prioritize "[e]nergy efficiency and other demand-side management resources" when evaluating Liberty's LCIRP, as required by RSA 378:39.

3. Liberty Has Failed to Comply with the Commission's Orders Governing LCIRP Filings.

In Order No. 25,762 (Feb. 9, 2015), the Commission found Liberty's previous LCIRP adequate, but required that Liberty, in its next LCIRP (*i.e.*, the LCIRP under consideration in this

docket), “address all of the statutory elements of RSA 378:38 and RSA 378:39 in its plan development in a granular way, so that reviewing parties may track the correspondence of the plan with the relevant statutory standards.” *Id.*; *see also*, *Northern Utilities Inc. d/b/a Unitil*, Docket No. DG 15-033, Order No. 26,027 (June 19, 2017) (ordering Northern Utilities to “comply with all statutory provisions” of the LCIRP statutes, including the requirement that its next LCIRP contain an assessment of demand-side energy management programs). Further, in Order No. 26,225 (March 13, 2019), the Commission ordered—in this docket—that Liberty submit a supplemental filing that “address[s] each of the specific elements required under RSA 378:38 and RSA 378:39 that are not already addressed in its LCIRP, with adequate sufficiency to permit the Commission’s assessment of potential environmental, economic, and health-related impacts of each option proposed in the LCIRP, as required by RSA 378:39.” *Id.*

Liberty’s supplemental filings continue Liberty’s troubling pattern of failing to comply with the Commission’s orders governing LCIRP filings. As discussed in sections II.A.1-2, *supra*, Liberty has failed to fully address the environmental and health related impacts of its plan and demand-side resources alternatives to its proposed expansion options. Liberty’s filings violate the Commission’s prior orders—including an order in this very docket (Order No. 26,225)—and preclude the Commission from evaluating Liberty’s LCIRP under RSA 378:39.

B. CLF’s Position that Liberty’s Filings Contravene the LCIRP Statutes is Supported by a Recent Report Filed in Docket No. DG 19-126.

In the Commission’s proceedings for the most recent LCIRP filed by Northern Utilities, Inc. (“Unitil”), Docket No. DG 19-126, pursuant to a settlement agreement (“Settlement Agreement”) entered into by Unitil, the Office of Consumer Advocate, and Commission Staff (now the Department of Energy), the parties agreed to convene a working group (“Working Group”) that would provide a report (“Report”) to the Commission “regarding whether and how

[Unitil's] future LCIRPs could further incorporate assessments of environmental, economic and health-related impacts into least cost planning, including consideration of alternative resources.”

Report, DG 19-126, at 1 (March 31, 2022) (emphasis in original). Additionally, the parties agreed that the Working Group Report would provide specific recommendations in the following areas:

(1) the statutory interpretation of RSA 378:37-40; (2) recommended criteria for the evaluation by [Unitil] of least cost resources to meet the applicable statutory requirements regarding environmental, economic and health-related impacts in future LCIRPs, including but not limited to alternative resources and optimization of pipeline capacities; and (3) the content and presentation of future LCIRP filings; including recommendations on how to integrate the Working Group's recommendations into the content and presentation of [Unitil's] next LCIRP filing.

Id. at 1-2 (emphasis in original).

On March 31, 2022, the Working Group submitted its Report to the Commission. A number of the recommendations in the Report support CLF's position that Liberty's filings are deficient in this docket.

First, with regard to the inclusion of demand-side energy management assessments in LCIRPs, the Working Group “interprets the State's energy policy to require utilities to maximize demand-side resources and therefore recommends that [Unitil] *evaluate demand-side resources beyond the NHSaves [energy efficiency] programs currently approved as potential resource additions in future LCIRP submissions.*” Report at 6-7 (emphasis added). Similarly, with respect to the recommended evaluation criteria for resource alternatives, the Working Group recommends that Unitil “evaluate a more thorough set of alternative resources, including demand side and renewable resources,” and assess increased deployment of energy efficiency outside of the energy efficiency docket to “maximize cost-effective EE.” *Id.* at 11.

Second, regarding the evaluation of impacts from both traditional and alternative resources, the Report recommends that Unitil “estimate the direct greenhouse gas (‘GHG’) emissions of portfolio resources and incremental resource options.” *Id.* at 14. The Report recommends that Unitil “estimate both fugitive emissions, which occur due to unintentional pipe leakage, and combustion emissions for all resource options,” and that Unitil determine emissions factors by “convert[ing] activity data into associated quantities of emissions.” *Id.* The Report also recommends that Unitil convert the emissions to a monetary impact and that in this analysis, energy efficiency “would be presumed to avoid the system average GHG emissions of [Unitil’s] portfolio.” *Id.* Regarding public health impacts, the Report finds that Unitil should estimate the amount of nitrous oxides, sulfur oxides, and particulate matter produced by gas resources and that these amounts should be used to assess public health impacts. *Id.* at 15.

Third, the Report contains a number of recommendations regarding non-pipeline alternatives (“NPAs.”). The Report finds that assessments of NPAs could potentially “delay future distribution system reinforcement costs, or increase the flexibility of other potential resource options” and, therefore, are “appropriate to consider.” *Id.* at 7. The Report encourages Unitil to “explore whether NPA opportunities exist” when “looking at incremental resources, whether demand-side or supply based.” *Id.* at 17. The Report explains that NPAs may “exist in the form of additional” energy efficiency and that Unitil “may have opportunities to more heavily market in [energy efficiency] programs in areas where pending gas distribution system improvements are needed to delay or postpone those system reinforcement investments.” *Id.* Accordingly, the Report finds that when assessing resource alternatives, Unitil “should look for opportunities to incorporate [NPAs] that could avoid or defer reinforcement costs associated with

distribution system infrastructure and seek to incorporate such opportunities as resource options are developed.” *Id.*³

In sum, the Report’s recommendations regarding the areas where Unital’s LCIRPs have not satisfied the LCIRP statutory requirements support CLF’s position that Liberty’s LCIRP fails to comply with several of these requirements, including in its assessments of (1) the environmental and public health impacts of Liberty’s preferred natural gas options; (2) demand-side resources, such as enhanced energy efficiency; and (3) non-gas and non-pipeline alternatives.

C. Liberty’s LCIRP Fails to Serve Its Intended Purpose.

Liberty filed this LCIRP in October 2017. The last meaningful action in this docket occurred in late 2019. Because of inaction in this docket, including the lack of a hearing on the LCIRP, Liberty’s LCIRP has not served its intended purpose of helping guide the Commission regarding Liberty’s planning decisions.

Under the LCIRP statutes, Liberty is required to submit an LCIRP at least every five years. RSA 378:38. The Commission is required to review the LCIRPs and may approve or reject the plans. RSA 378:39. The LCIRP statutes further provide that:

No rate change shall be approved or ordered with respect to any utility that does not have on file with the commission a plan that has been filed and approved in accordance with the provisions of RSA 378:38 and RSA 378:39. However, nothing contained in this subdivision shall prevent the commission from approving a change, otherwise permitted by statute or agreement, where the utility has made the required plan filing in compliance with RSA

³ CLF notes that the Report states that it “takes no position on the question of whether supply options assessed by a natural gas utility for LCIRP purposes should include options that do not involve the use of natural gas or other commodities delivered via [Unital’s] distribution pipeline network.” Report at 7. CLF disagrees with this statement and recommends that natural gas utilities should consider non-commodity supply options, such as heat pumps. Despite this disagreement, however, CLF believes that the Report’s recommendation regarding non-pipeline alternatives—and which the Report deems to include increased energy efficiency—would encompass heat pumps, as such forms of strategic electrification “could avoid or defer reinforcement costs associated with distribution system infrastructure.” Report at 17.

378:38 and the process of review is proceeding in the ordinary course but has not been completed.

RSA 378:40.

Because RSA 378:40 provides that the Commission may not approve a utility's rate changes unless (1) the Commission has approved the utility's LCIRP, or (2) the utility has filed an LCIRP and the Commission's review of the LCIRP is proceeding in the ordinary course, LCIRPs are intended to function as an integral component of the Commission's oversight and regulation of New Hampshire's gas and electric utilities. Indeed, the Commission has recognized that a "well-crafted LCIRP" "allow[s] the Commission the opportunity for input regarding [a utility's] current planning processes, procedures, criteria, and planned investments." *Public Service Company of New Hampshire d/b/a Eversource Energy*, DE 19-139, Order No. 26,362, at 8 (N.H.P.U.C., June 3, 2020). The Commission also has determined that LCIRPs "provide[] a regular snapshot of the factors supporting a utility's investment decisions, which can be helpful in a later rate case when the Commission determines whether the costs of an investment were prudently incurred" and that "[m]aterial departures from approved planning processes, procedures, criteria, or adjudicated options, and the basis for those departures, will be a key consideration during prudence reviews." *Id.*

Additionally, the Commission has made clear that the LCIRP "should not exist in a vacuum, and it should incorporate as much of a utility's true business planning information as possible." *Public Service Company of New Hampshire*, Docket No. DE 10-261, Order No. 25,459, at 18 (January 29, 2013). In *Public Service Company of New Hampshire*, Docket No. DE 10-261, the Commission expressed concern "that the time and expense of producing an LCIRP as done in the past may no longer result in a document that has significant value to a utility, to the Commission or to ratepayers" and that it was "troubled" by PSNH's view of its "LCIRP

filing as a document tantamount to a reporting form, filed for compliance purposes, with its ‘real’ planning methodologies being implemented internally in parallel to the LCIRP process.”

Id. The Commission directed PSNH to consider the LCIRP process “not as an arid regulatory compliance, but rather, as a component of and a reflection of its internal planning processes” and to “demonstrate that it synchronizes (if even at a general level of detail) the information provided in its LCIRP with its internal business planning.” *Id.* In fact, the Commission initially recognized the relevance and importance of the LCIRP under consideration in these proceedings to Liberty’s investment decisions being considered in other proceedings when it approved parallel procedural schedules for the instant docket and the Granite Bridge Project docket, DG 17-198.

Unfortunately, given that (1) Liberty filed its LCIRP in this docket nearly five years ago; (2) the Commission already has issued decisions regarding Liberty’s gas expansion plans in other dockets, (*see, e.g.*, Docket No. DG 21-008); (3) no hearings have taken place in this docket; and (4) Liberty’s next LCIRP is due in less than five months, this LCIRP proceeding has failed to provide the Commission with “the opportunity for input regarding [Liberty’s] current planning processes, procedures, criteria, and planned investments.” *Public Service Company of New Hampshire d/b/a Eversource Energy*, DE 19-139, Order No. 26,362, at 18. Moreover, the lack of a hearing and/or decision in this proceeding, as well as decisions in other dockets involving Liberty’s planned investments, have resulted in the troubling situation encountered in *Public Service Company of New Hampshire*, Docket No. DE 10-261, where Liberty’s LCIRP has served as little more than “a document tantamount to a reporting form, filed for compliance purposes” only. *Public Service Company of New Hampshire*, Docket No. DE 10-261, Order No. 25,459, at 18 (January 29, 2013). To ensure that LCIRPs can provide the Commission with the opportunity to provide input into Liberty’s investment decisions and can serve as a true

“component of and a reflection of [Liberty’s] internal planning processes,” it is essential that, in the future, the Commission conduct its review of Liberty’s LCIRP in parallel with its review of Liberty’s proposed investments and that the Commission make a decision on Liberty’s LCIRP early enough during the five-year LCIRP such that it can help guide the Commission in decisions regarding Liberty’s proposed investments.

III. Conclusion

For the foregoing reasons, the Commission should conclude that Liberty has failed to comply with the LCIRP statutory requirements, RSA 378:37-40, as well as the Commission’s prior orders, and reject Liberty’s LCIRP. The Commission should also adopt a procedural and hearing schedule for Liberty’s next LCIRP that enables the LCIRP to serve its intended purpose of helping to guide the Commission in its review of Liberty’s planning decisions.

By: /s/ Nick Krakoff
Nick Krakoff, Staff Attorney
Conservation Law Foundation
27 North Main Street
Concord, NH 03301
(603) 225-3060 x 3015
nkrakoff@clf.org

June 1, 2022

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Summary of Position has, on this 1st day of June 2022, been sent by email to the service list in Docket No. DG 17-152.

Respectfully submitted,

By: */s/Nick Krakoff*
Nick, Staff Attorney
Conservation Law Foundation
27 North Main Street
Concord, NH 03301
(603) 225-3060 x 3015
nkrakoff@clf.org