

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

Docket No. DG 17-152

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities  
Least Cost Integrated Resource Plan

**DIRECT TESTIMONY**

**OF**

**SHERRIE TREFRY**

June 28, 2019

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1 **I. PERSONAL BACKGROUND**

2 **Q. Please state your name, title, and business address.**

3 A. Sherrie L. Trefry, CSS, Director of Energy and Environmental Services, VHB, 2 Bedford  
4 Farms Drive, Suite 200, Bedford, New Hampshire.

5 **Q. Briefly summarize your educational background and work experience.**

6 A. I was educated at the University of New Hampshire in Durham, New Hampshire, where I  
7 obtained a BS in Environmental Conservation with a concentration in Soil Science in 1999  
8 and a MS in Natural Resources, Soil Science, in 2001.

9 I have 15 years of New Hampshire environmental consulting experience. I began my  
10 career as an Environmental Consultant in 2004 with New Hampshire Soil Consultants, Inc.  
11 (NHSC) following a 30-month assignment as an Agroforestry Peace Corps Volunteer in  
12 Cameroon, Africa. I worked for NHSC conducting wetland delineations, wetland function  
13 and value assessments, wetland restoration implementation and monitoring, soils mapping,  
14 and local, state and federal environmental permitting until 2009. In 2009, NHSC was  
15 acquired by GZA GeoEnvironmental, Inc. (GZA). From 2009 to 2014, I worked at GZA  
16 primarily conducting natural resource assessments and preparing environmental permit  
17 applications for electric utility projects in New Hampshire. In 2014, I joined VHB as the  
18 Director of Energy Services to continue to provide environmental services to energy  
19 clients. In 2016, I was promoted to Director of Energy and Environmental Services  
20 overseeing a team of professionals providing natural resource assessment and permitting  
21 services to clients in various markets.

1 I am a Certified Soil Scientist in the State of New Hampshire (CSS #93) and in the State  
2 of Maine (SS #527). I am currently an active member of the Society of Soil Scientists of  
3 Northern New England and the New Hampshire Association of Natural Resource Scientists  
4 and have formerly served on the Board of Directors for each organization.

5 **Q. Have you previously testified before the New Hampshire Public Utilities**  
6 **Commission?**

7 A. No. I have not previously testified before the New Hampshire Public Utilities Commission.

8 **Q. What is your involvement in the Granite Bridge Project?**

9 A. I am a consultant hired by Liberty Utilities to lead the permitting process for the Granite  
10 Bridge Project. I am responsible for identifying and preparing the environmental permit  
11 applications. To support the development of the permit applications, I have coordinated  
12 the completion of appropriate natural resource assessments and regulatory consultations. I  
13 expect to provide testimony before the New Hampshire Site Evaluation Committee in  
14 support of the Granite Bridge Project.

15 **Q. What is the purpose of your testimony?**

16 A. The purpose of my testimony is to describe the permits that will be required to support  
17 Liberty Utilities' planned filing before the New Hampshire Site Evaluation Committee for  
18 the Granite Bridge Pipeline, and also to describe the permits that would likely be required  
19 for a similar filing to support the expansion of the Tennessee Gas Pipeline (TGP) Concord  
20 Lateral, which is an alternative to the Granite Bridge Pipeline.

1 **Q. Can you describe the Granite Bridge Pipeline project?**

2 A. The Granite Bridge Pipeline project is a proposed natural gas pipeline that is to run from  
3 Exeter to Manchester within the state-owned Route 101 Energy Infrastructure Corridor.  
4 As stated above, Liberty Utilities hired VHB to lead the Granite Bridge permitting process.  
5 Therefore, I am familiar with the various permits that will be required for the Granite  
6 Bridge Pipeline.

7 **Q. Can you describe the TGP Concord Lateral expansion project?**

8 A. I understand from my work on the Granite Bridge Project that an alternative to the Granite  
9 Bridge Pipeline is an expansion of the Concord Lateral, which expansion would be  
10 constructed by its owner, TGP. I also understand that although TGP provided Liberty with  
11 confidential estimates of the cost to complete an expansion of the Concord Lateral, TGP  
12 did not provide specific plans. Thus, I do not know TGP's specific plans for expanding  
13 the Concord Lateral to provide additional capacity similar to what the Granite Bridge  
14 Pipeline would provide. For purposes of this testimony, however, I will assume that  
15 expansion of the TGP would involve construction of new sections of transmission pipeline  
16 and perhaps a compressor station, which new construction would likely require approval  
17 by the SEC<sup>1</sup> or a similar siting process through the Federal Energy Regulatory Commission  
18 ("FERC"). The Concord Lateral is part of an interstate pipeline and its expansion would  
19 likely be subject to FERC's siting process.

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<sup>1</sup> The SEC has jurisdiction over "energy facilities" which include "energy transmission pipelines." RSA 162-H:2, VII(a)

1 **II. ENVIRONMENTAL ASSESSMENTS**

2 **Q. Please describe the permit application efforts that would be required for the Granite**  
3 **Bridge Pipeline.**

4 A. The Granite Bridge Pipeline will require a Certificate of Site and Facility to be issued from  
5 the Site Evaluation Commission (SEC). The Company will have to prepare an SEC  
6 application that addresses the applicable siting criteria under the SEC rules. This includes  
7 a number of studies and assessments pertaining to environmental, visual, health and safety,  
8 historic, and orderly development effects of the project on the State. As part of the SEC  
9 process, review of the project by the New Hampshire Department of Safety, Division of  
10 Fire Safety, State Fire Marshal is required to ensure compliance with the State Fire Code  
11 and the State Building Code.

12 Particular to my area of expertise, the project will require significant ground disturbance  
13 for the installation of additional pipe and infrastructure that would require various permits  
14 through the New Hampshire Department of Environmental Services (NHDES) (which  
15 permitting process falls under the umbrella of the SEC). The Granite Bridge Pipeline will  
16 require a Wetlands Permit for wetland impacts, a Shoreland Permit for impacts to protected  
17 shoreland, a 401 Water Quality Certificate if the project requires an Individual Army Corps  
18 404 Permit, and an Alteration of Terrain Permit for ground disturbance that exceeds  
19 100,000 square feet. Since the Granite Bridge Pipeline does not involve a compressor  
20 station, an Air Resources Division Permit is not required from NHDES. As part of the  
21 NHDES permit applications, the Company is also consulting with the New Hampshire  
22 Natural Heritage Bureau (NHNHB) to determine if any rare, threatened, or endangered

1 species are present in the project vicinity, and with the NHNHB for any listed plants and  
2 with the New Hampshire Fish and Game Department for any listed animals. Liberty  
3 Utilities will also have to consult with the New Hampshire Division of Historical Resources  
4 (NHDHR) regarding any known or potential historic resources are present within the  
5 project vicinity.

6 The Granite Bridge Pipeline will require a number of approvals from the New Hampshire  
7 Department of Transportation for installation of the pipeline. Required permits will include  
8 NHDOT Excavation Permits, Crossing and Temporary Use permits, and Driveway permits  
9 to access the work area from State roads. Approvals are also required from the Bureau of  
10 Trails since trail crossings are required.

11 In addition to state permits, the project will require federal permits. A Notice of Intent will  
12 have to be filed with the United States Environmental Protection Agency (USEPA) for  
13 coverage under the Construction General Permit for ground disturbance in excess of one  
14 acre. The project will also require a Section 404 permit under the Clean Water Act to  
15 impact waters of the United States. In support of the 404 Permit, Liberty Utilities will have  
16 to consult with the United States Fish and Wildlife Services to determine if any nationally  
17 listed endangered species occurred within the project vicinity.

18 **Q. Please describe the permit application efforts that would be required for the TGP**  
19 **Concord Lateral Expansion project.**

20 A. As stated above, I assume that an upgrade of the Concord Lateral would include  
21 construction of new transmission pipeline and possibly a compressor station. If such a

1 project were presented to the SEC, it would require the same permits that are required for  
2 the Granite Bridge Pipeline that are described above, with one important difference.  
3 Should the Concord Lateral upgrade include a new compressor station, it would also have  
4 to obtain an Air Resources Division Permit from NHDES.

5 If the Concord Lateral upgrade required FERC approval rather than SEC approval, it is my  
6 understanding that TGP would still have to demonstrate to FERC that the project would  
7 comply with all applicable state and local environmental laws.

8 **Q. RSA 378:38, VI, requires “An assessment of plan integration and impact on state**  
9 **compliance with the Clean Air Act of 1990, as amended, and other environmental**  
10 **laws that may impact a utility's assets or customers.” What is your assessment of the**  
11 **relative impacts of the Granite Bridge Pipeline and an upgrade of the Concord**  
12 **Lateral on “other environmental laws”?**

13 A. As described above, both projects would require permits to demonstrate compliance with  
14 the identified environmental laws. Assuming both projects perform the necessary work to  
15 obtain those permits and comply with those laws, there would be no meaningful difference  
16 between them as to their impact on these environmental laws.

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

18 A. Yes it does.