

March 8, 2018

Via E-mail (Executive.Director@puc.nh.gov and puc@puc.nh.gov)
Debra Howland, Executive Director
NH Public Utilities Commission
21 South Fruit Street, Suite 10,
Concord, N.H. 03301-2429

RE: DG-17-198 Liberty Utilities (EnergyNorth Natural Gas) Corp. Petition to Approve Firm Supply, Transportation Agreements and the Granite Bridge Project

Dear Director Howland,

Please file this as a public comment letter.

I strongly urge the Public Utilities Commission to heed the wise advise of the Office of Consumer Affairs and reject immediately Liberty Utilities' Motion for Confidentiality regarding this Petition. To proceed with a decision on the severely redacted Petition as presented would be a breach of the public trust.

The mass of blacked-out figures on Liberty's Levelized Cost Analysis for the Granite Bridge Pipeline and the LNG Facility are appalling evidence of Liberty's contempt for the public's right to know. They allow NO analysis of the financial feasibility of the project.

To accept this Petition as presented without having the costs and rate base figures known would be a violation of New Hampshire's right-to-know law, RSA 91-A:5. The public has a strong interest in knowing the figures that form the basis for the feasibility of this extremely large project. What risks to the ratepayers are being hidden by Liberty?

One obvious risk is that of stranded costs. Liberty projects a 55-year lifespan for the pipeline and 40 years for the LNG facility. Much can change during this very long amortization period. Even now wind energy is now one of the most affordable options for new electricity generation. Lazard's 2016 Levelized Cost of Energy Analysis shows that wind's unsubsidized cost is equivalent to the cost of gas combined cycle electric generation. This is not conducive to the financial viability of a massive new gas facility. (See attached chart)

Climate change is another serious risk from greatly expanding the use of natural gas. Natural gas, or methane, can no longer be considered a "bridge fuel". Now it is known to be a powerful greenhouse gas, 80 times more potent than carbon dioxide in driving climate change over the next 20 years. Chronic methane leaks plague the natural gas delivery system from wellheads to distribution pipes, accelerating climate change.

The switch from fossil fuels to renewable energy needs to happen well before the next decade. Even now our seacoast is threatened with sea level rise, more frequent intense storms damage our infrastructure, our winter sports industry suffers from lack of snow, our forests, wildlife, and also ourselves are vulnerable to insect pests and diseases brought to New England by warming temperatures.

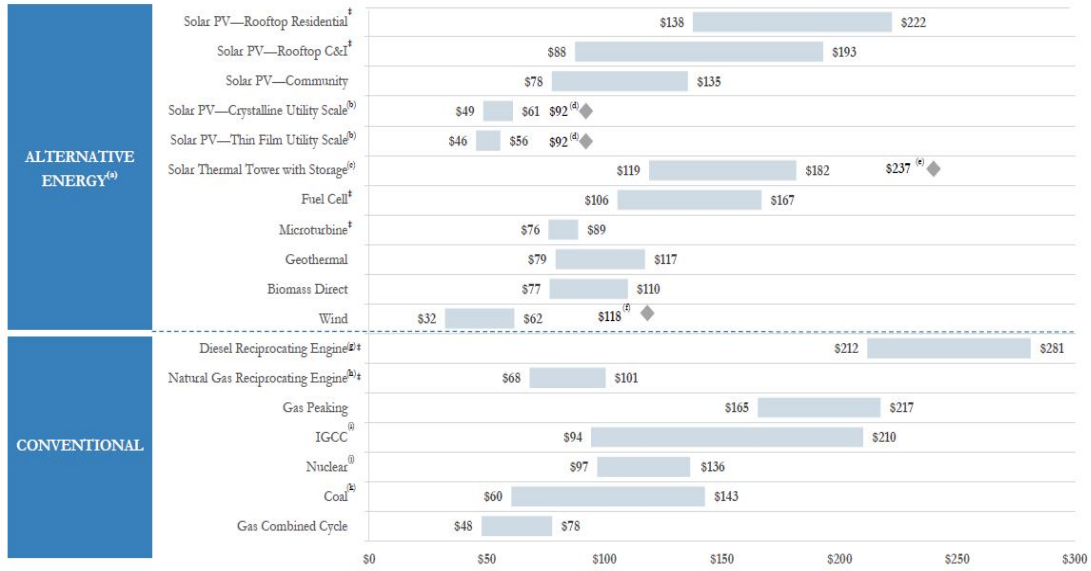
I urge the Commission to consider the future health of New Hampshire's economy and environment. Please decide against massive new gas projects like Granite Bridge, especially when their proponents seek secrecy from public scrutiny.

Sincerely,
Liz Fletcher
288 Marcel Road, Mason NH 03048

cc: D. Maurice Kreis, Consumer Advocate
Office of Consumer Advocate

Lazard's 2016 Levelized Cost of Energy Analysis - Version 10.0

The financial services company Lazard reports in their 2016 Levelized Cost of Energy Analysis that wind energy is now one of the most affordable options for new electricity generation. Wind's unsubsidized levelized cost of energy (\$/MWh) is competitive with conventional generation in certain regions of the country, ranging from \$32/MWh to \$62/MWh in 2016, with pricing lowest in the Interior region of the country.



Source: Lazard's Levelized Cost of Energy Analysis - Version 10.0