

June 20, 2018

Debra Howland Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord New Hampshire 03301
RE: DG 18-092

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities - Keene Division
Petition for a License to Construct and Maintain a Natural Gas Pipeline beneath the Ashuelot River in Keene

Thank you for accepting my comments on DG 18-092.

I suppose I shouldn't be surprised that the people of Keene were not informed of this project. I would appreciate an explanation of an "Order Nisi" in terms of who is allowed to challenge the project and the timeframe for any decisions. Following so closely on the heels of a petition for a Declaratory Ruling on Liberty's franchise right to distribute Natural Gas in Keene without public information sessions or any consideration of a significant change in the nature of the gas to be distributed, it certainly seems that Liberty is intent on keeping the public "in the dark" until it is too late for them to respond.

In the petition for DG 18-092, Liberty states that,

"9. As described above, the crossing is critical to the economic and safe upgrade and repair of the existing river crossing at West Street. The existing pipeline that crosses the river at this location cannot be shut down for repair because it is a one-way feed. The planned installation of a pipe across the Ashuelot River at the Winchester Street bridge will allow a temporary shutdown to permit the repair of the West Street bridge. The installation of pipe across the Ashuelot River at the Winchester Street Bridge will also increase the reliability of the Keene distribution system by providing another main across the river. The crossing is thus "necessary to meet the reasonable requirements of reliable service." *See EnergyNorth Natural Gas*, Order No. 25,572 (Sept. 19, 2013)."

In fact, the plans for this crossing were already in the works back in December of 2017 as evidenced by communications between the city, Liberty and the contractor. The leak of the main on West Street http://www.sentinelsource.com/news/local/gas-leak-on-keene-s-west-street-repaired/article_30b6a32e-5e2b-535b-9400-a891b7233eb3.html was discovered back in April of this year, and follows the report of a gas leak on a distribution line one year earlier. http://www.sentinelsource.com/news/local/officials-investigate-gas-smell-part-of-west-st-closed-in/article_55c60091-0781-5fa2-8a78-7759160af3ca.html

Why is it not possible for Liberty to shutdown the main and replace it during the summer when it may be presumed that customers will not need the gas for heating purposes? I would like to see additional justification for not being able to repair the line by shutting it down. Where are the plans for repairing the West Street crossing if, in fact, that is part of the purpose here? Will both crossings continue to flow gas after the Winchester Street crossing is completed?

Liberty maintains that there is no risk to the waterway because they will be using Horizontal Directional Drilling (HDD) to cross the Ashuelot 17 feet below the river. In fact, there is a potential for a problem known as a “frac out” <http://trca.on.ca/dotAsset/105401.pdf> in which drilling fluid can contaminate a waterway. <https://stateimpact.npr.org/pennsylvania/2018/03/16/sunoco-spills-drilling-fluid-into-lebanon-county-creek-for-third-time/> “Drilling was immediately stopped, the mud was contained and removed, and the DEP was notified,” he said.”

Moreover, once the pipeline is completed, it will require hydrostatic testing. Where will the water for the hydrostatic tests come from and how will it be disposed of? [500,000 gallons of contaminated water produced while testing Sandisfield pipeline; decontamination fails |](#)

Most important, I recently learned that switching from an air/propane system to CNG/LNG carries a much higher threat of contributing to global warming. Propane has a Global Warming Potential (GWP) factor of 3.3 (3.3 times that of a molecule of Carbon), while natural gas has a GWP of 86 over the first 20 years! The molecular formula for natural gas (methane) is CH₄, while propane is C₃H₈.

Since the lost and unaccounted for gas in Keene is 2.6% of the total distributed gas, changing from an Air/Propane system to CNG/LNG is a step in the wrong direction in terms of climate change.

I find it very disturbing that Liberty appears to hide the details of the project it undertakes and consistently uses “emergencies” when they actually have been planning certain projects (e.g. shutdown of Concord Steam) for years.

Sincerely,

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