

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: December 4, 2018

AT (OFFICE): NHPUC

FROM: Paul Kasper, Assistant Director, Safety Division

SUBJECT: Staff Recommendation in Docket No. DG 18-092 Petition of Liberty Utilities, (Energy North Natural Gas) Corp. for a License to Cross the Ashuelot River in Keene, New Hampshire With Regards to Plan B

TO: Martin P. Honigberg, Chairman
Kathryn M. Bailey, Commissioner
Michael S. Giaimo, Commissioner
Debra A. Howland, Executive Director
Paul Dexter, Staff Attorney

As follow-up to Staffs testimony during the Docket Hearing for DG 18-092 on November 26, 2018, Staff reviewed Liberty Utilities Plan B and concludes that this alternative is acceptable and believes any impact to the public from this river crossing will be negligible, as a result of the directional bore and the prescribed depth below the river bottom and proximity to the Winchester Bridge structure.

Safety Division Staff Review Conclusions and Conditions for Plan "B"

The Safety Division supports approval of Liberty's petition for Plan B under RSA 371:17 and RSA 371:20 with the following conditions:

- a. Approval shall be limited to Liberty's Plan B natural gas pipeline under consideration in this docket.
- b. Liberty shall construct, operate, and maintain the piping consistent with both Puc 506.02, 49 CFR Part 192 requirements, and the North American Society for Trenchless Technology's (NASTT's) Horizontal Directional Drilling Good Practices Guidelines (4th edition).
- c. Liberty shall be directed to operate and maintain the crossing in conformance with the latest 49 CFR Part 192 amendments. Any and all future alterations to the crossing that may impact the public shall conform to the most current CFR Part 192 amendments in effect at the time of submittal of the alteration.

- d. Liberty shall use above ground pipeline markers for identification of the pipeline with appropriate warning and company contact information on each bank of the Ashuelot River crossing. A method for detecting the pipeline for future locating purposes shall be installed such as using tracer wire or other suitable methods.
- e. Continuous monitoring for possible hydro fracture situations shall be provided during the HDD operation.
- f. Containment measures shall be implemented immediately during a hydro fracture situation that at a minimum include notifications be made to the NH PUC Safety Division and NH DES. Clean up procedures shall also be implemented in the event a hydro fracture, onsite prior to the beginning of the HDD operation.

If these conditions are met, the Safety Division is of the opinion that the proposed natural gas pipeline crossing as described in Plan B will meet all current safety standards (Puc 506.02 and 49 CFR Part 192).

The Safety Division believes the construction of the new gas distribution main under the Ashuelot River, as proposed in Plan B, may be exercised without substantially affecting the public rights in said waters and lands (RSA 371:20).

The Safety Division is also of the opinion that the proposed natural gas pipeline crossing in Plan B is necessary to meet the reasonable requirements of service to the public (RSA 371:17).

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**

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- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**
- c) Serve a written copy on each person on the service list not able to receive electronic mail.**