



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

Docket No. DG 19-XXX

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities  
Winter 2019/2020 Cost of Gas Filing  
Summer 2020 Cost of Gas Filing

**DIRECT TESTIMONY**

**OF**

**MARY E. CASEY**

September 3, 2019

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1 **I. INTRODUCTION**

2 **Q. Please provide your name, job title, and job description.**

3 A. My name is Mary E. Casey. I am the Senior Manager, Environment, for Liberty Utilities  
4 Service Corp. (“Liberty”). I am responsible for overseeing the management,  
5 investigation, and remediation of manufactured gas plant (MGP) sites for Liberty Utilities  
6 (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (“EnergyNorth” or the  
7 “Company”), as well as operational environmental compliance, including air and waste  
8 permitting, wetlands permitting, and protection and spill response.

9 **Q. Please describe your educational and professional background.**

10 A. I hold a Bachelor of Science in Chemical Engineering from Polytechnic Institute of New  
11 York, and a Master of Science in Civil/Environmental Engineering from Polytechnic  
12 University. I have been employed by Liberty since July 3, 2012, managing the  
13 investigation and remediation of MGP sites. Prior to my employment by Liberty, I held  
14 the position of Principal Environmental Engineer for National Grid and KeySpan Energy,  
15 with responsibility for operational environmental compliance.

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

17 A. The purpose of my testimony is to discuss the status of EnergyNorth’s site investigation  
18 and remediation efforts at various MGP sites in New Hampshire, to briefly describe the  
19 MGP-related activities performed by the various contractors and consultants, to discuss  
20 the costs for which the Company is seeking rate recovery, and to describe the status of  
21 the Company’s efforts to seek reimbursement for MGP-related liabilities from third

1 parties. My testimony is intended to update the information provided by the Company in  
2 prior cost of gas proceedings. The costs associated with these investigations and  
3 remediation efforts and certain of the amounts recovered from third parties are included  
4 in the schedules and other data prepared by Mr. Simek and Ms. McNamara as part of the  
5 Company's cost of gas filing.

6 **II. STATUS OF INVESTIGATION AND REMEDIATION ACTIVITIES**

7 **Q. Please briefly describe the status of each of the Company's MGP sites.**

8 A. Consistent with past practice, the description of the status of investigation and  
9 remediation efforts at each site, as well as the various efforts to recover the site  
10 investigation and remediation costs from third parties, are summarized in materials  
11 included in the Company's filing at Schedule 20. In addition, we are in the process of  
12 attempting to schedule a technical session with Commission Staff and the Office of  
13 Consumer Advocate to keep them apprised of the status of site investigation and  
14 remediation efforts.

15 **Q. Please briefly describe the current status of the Company's remediation efforts at**  
16 **the Lower Liberty Hill site in Gilford and any significant events over the course of**  
17 **the past year at that site.**

18 A. The project has been completed since December 2015. The site is stable and the grass is  
19 mowed twice a year. The Notice of Activity and Use Restriction (AUR) was approved  
20 by New Hampshire Department of Environmental Services ("NHDES") and recorded at  
21 the Belknap Registry of Deeds in February 2017. The groundwater wells are monitored

1 and sampled once a year per the new Groundwater Management Permit that was obtained  
2 from NHDES in May 2017. This post-remediation permit involves sampling fewer wells  
3 with half the frequency.

4 **Q. Please briefly describe the current status of the Company's remediation work at the**  
5 **Manchester MGP.**

6 A. On-site activities in the past year included further investigation and remediation of areas  
7 showing localized contamination, as described in the December 2014 Remedial Design  
8 Report approved by NHDES. These remediation activities included further investigation  
9 and removal of material from a subsurface tar liquor decanter tank located in the gas  
10 plant. Approximately 3,000 gallons of oil-contaminated water, and 6,000 gallons of  
11 dense non-aqueous phase liquid (“DNAPL”)/sludge and washwater were removed from  
12 the structure. Upon NHDES approval, the structure was then filled with approximately  
13 50 cubic yards of flowable fill/sand. In addition, three new DNAPL recovery wells were  
14 installed on the western edge of the site to recover product on a monthly basis. Some of  
15 the costs incurred in the past year were related to materials management and disposal,  
16 and oversight assistance during various capital gas system construction projects on the  
17 site that occurred in the previous period.

18 **Q. Please briefly describe the current status of the Company's remediation work at the**  
19 **Concord MGP.**

20 A. In early 2018, the Company met with the City Engineer regarding the latest design for the  
21 remediation of the east side of I-93 (Concord Pond). The Company and City are moving

1 toward a remedy that will also allow the City to access its storm water system for  
2 maintenance on the east side of the highway where the wetland cap will be constructed.  
3 A design involving wetland and subaqueous capping is being finalized.

4 In 2017, the Company received approval from NHDES on a near-bank sediment  
5 sampling program in the Merrimack River, or Monitored Natural Recovery (MNR). This  
6 program involves annual sediment sampling for contaminants and river bathymetry  
7 studies to monitor both the chemical and physical behavior of sediments that may have  
8 been impacted by coal tar wastes. There will be five annual samplings, the second of  
9 which was conducted in October 2018.

10 **Q. Please briefly describe the current status of the Company's remediation work at the**  
11 **Nashua MGP.**

12 A. In early 2019, the Company proposed a cap design for the paved areas of the engineered  
13 cap area that utilizes only asphalt, which will simplify construction and result in  
14 substantial cost savings. In May 2019, the NHDES accepted details of this cap and  
15 construction is planned for 2020, in conjunction with a capital paving project for this  
16 property. In May 2019, NHDES also approved a new five-year Groundwater  
17 Management permit that reduces the sampling frequency from semi-annual to annual for  
18 all but two monitoring wells. The Company is not required to include Per- and  
19 Polyfluoroalkyl Substances (“PFAS”) compounds as part of its groundwater monitoring  
20 parameters based on the levels found during last year’s sampling. However, per the

1 current NHDES policy, they have requested that a second confirmatory round of  
2 sampling be done for these compounds.

3 **Q. What other MGP investigation and remediation activity has the Company**  
4 **undertaken in the last year?**

5 A. No other MGP investigation and remediation activity has occurred in the last year.

6 **III. STATUS OF INSURANCE COVERAGE LITIGATION**

7 **Q. Have there been any recent significant developments in the Company's efforts to**  
8 **seek contribution from its insurance carriers in the past year?**

9 A. No. Insurance recovery efforts are complete with respect to all of the Company's former  
10 MGP sites.

11 **Q. What environmental remediation efforts do you anticipate for the remainder of**  
12 **2019 and in 2020?**

13 A. At the Manchester MGP site, the Company will continue remediation of localized areas  
14 of contamination on-site as well as working on the storm drain improvement for a  
15 deteriorated drainage pipe along the western boundary of the property. At the Concord  
16 MGP site, the Company will continue to seek out interested developers to re-purpose the  
17 building and property, and continue environmental site monitoring. For the Concord  
18 Pond site, the Company will continue to work with the City to design and construct the  
19 wetland cap remedy per the approved design, and that will allow the City access for  
20 maintenance of the storm water outfall. The monitoring of near bank sediments will  
21 continue in October 2019 per the NHDES-approved Monitored Natural Recovery plan.

1           At the Nashua MGP site, the Company is targeting 2020 for capping and paving to  
2           commence, now that approval of the cap design has been received. All sites are also now  
3           in the monitoring phase, so groundwater monitoring will occur at all of them under their  
4           respective Groundwater Management Permits.

5   **Q.    Does this conclude your direct testimony?**

6   **A.    Yes, it does.**