



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

Docket No. DG 20-XXX

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities
Winter 2020/2021 Cost of Gas
Summer 2021 Cost of Gas

DIRECT TESTIMONY

OF

MARY E. CASEY

September 1, 2020

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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 “ompany”), 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.

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

15 A. The project has been completed since December 2015. The site is stable and the grass is
16 mowed twice a year. The Notice of Activity and Use Restriction (AUR) was approved
17 by New Hampshire Department of Environmental Services ("NHDES") and recorded at
18 the Belknap Registry of Deeds in February 2017. The groundwater wells are monitored
19 and sampled once a year per the new Groundwater Management Permit that was obtained
20 from NHDES in May 2017.

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

3 A. On-site activities in the past year included further investigation and remediation of areas
4 showing localized contamination, as described in the December 2014 Remedial Design
5 Report approved by NHDES. These remediation activities included further investigation
6 and removal of material from a subsurface tar liquor decanter tank located in the gas
7 plant in June 2019, involving substantial waste removal and disposal. These costs were
8 invoiced in July 2019, and are including in this filing. In addition, a substantial amount
9 of MGP-impacted soil was removed and sent off site for disposal in conjunction with a
10 water supply line reconstruction that occurred last summer at the entrance to the plant
11 property. Groundwater monitoring is ongoing twice a year pursuant to the Groundwater
12 Management Permit for this site.

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

15 A. The Company and City are moving toward a remedy for the MGP-impacted "Concord
16 Pond" site on the parcel known as Healy Park. The design was altered so that no work
17 will be done in the Department of Transportation Limed Access I-93 Right-of-Way, and
18 it will also allow the City to access its storm water system for maintenance on the east
19 side of the highway where the wetland cap will be constructed. A design involving
20 wetland and subaqueous capping is being finalized. The City and the Company are
21 presently drafting a Memorandum of Understanding that gives legal access for the pre-
22 design investigation field work, the construction of the remedy and subsequent

1 maintenance of the capped area after its completion. The construction of the remedy was
2 planned to take place in 2020, but the Company decided to delay this activity to 2021 due
3 to the COVID-19 pandemic.

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 third of which
9 was conducted in October 2019.

10 The City and the Company jointly prepared a report that details various use options for
11 the Gas Holder site on the east side of the highway, including costs for various scenarios
12 ranging from cleaning and fortifying the holder structure for public entry to demolition of
13 the structure. City Council is presently reviewing the options in the report. At the
14 Concord MGP gas holder site on the west side of the highway, further deterioration of the
15 structure has been observed. As a result, new sections of security fence had to be
16 installed.

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

19 A. In May 2019, the NHDES accepted details of a cap design for the central portion of the
20 property, and construction was planned for 2020, in conjunction with a capital paving
21 project for this property. However, this cap and pave project has been moved to the 2021

1 construction season due to the COVID-19 pandemic. The Company is presently working
2 on obtaining State and Local permitting for this project.

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 in the dry season of 2021. The monitoring
20 of near bank sediments will continue in October 2020 per the NHDES-approved
21 Monitored Natural Recovery plan. At the Nashua MGP site, the Company is targeting

1 2021 for capping and paving to commence, now that approval of the cap design has been
2 received. All sites are also now in the monitoring phase, so groundwater monitoring will
3 occur at all of them under their respective Groundwater Management Permits.

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

5 **A. Yes, it does.**