



July 17, 2015

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301

Re: DG 14-380 – Liberty Utilities Petition for Approval of a Firm Transportation Agreement with the Tennessee Gas Pipeline Company, LLC

Dear Ms. Howland,

I write on behalf of the International Brotherhood of Electrical Workers (IBEW) with respect to the proposed Precedent Agreement (PA) between Liberty Utilities and Tennessee Gas Pipeline Company. The IBEW represents the hard working, highly skilled women and men in the electrical construction and maintenance industries. Our members support the proposed settlement agreement between PUC Staff and Liberty Utilities in Docket DG 14-380.

Since 2012, New Hampshire's businesses and residents have seen their electric rates fluctuate dramatically due to the lack of natural gas capacity into the region. This lack of capacity has led to price spikes in the wintertime, as local gas distribution companies use their natural gas capacity to serve heating customers. As noted by the Public Utilities Commission in its Order of Notice for IR 15-124, "Overall, the average retail price of electricity in New England is the highest in the continental United States, posing a threat to our region's economic competitiveness." The IBEW is dependent on a strong, robust economy to attract and retain businesses to New Hampshire.

The proposed PA will help to alleviate the cycle of high winter electric prices by bringing additional capacity into the region. Today, natural gas generators rely on capacity from local distribution companies (LDC), like Liberty, to fuel their plants when not needed by the LDCs to meet the thermal needs of their

customers. The PA is for a term of 20 years, which means that in the short-term Liberty Utilities could make available its reserve capacity to serve natural gas generators while they expand their distribution system and grow into the new capacity. While this may not be a long-term solution to the high electric prices, it certainly can lower prices in the short-term, while a long-term solution is developed. Moreover, by "selling off" some of its short-term reserve capacity to gas generators, Liberty's existing and future customers benefit from the reduced cost of the contract.

We urge the New Hampshire Public Utilities Commission to approve the settlement agreement between PUC Staff and Liberty Utilities. This agreement is a vital step towards reducing the cost of electricity in the region, improving New Hampshire's economy and creating the jobs needed to fuel the next generation of skilled workers.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joe Casey".

**Joe Casey**  
International Rep.  
IBEW