

ORIGINAL

N.H.P.U.C. Case No.	DG 14-380
Exhibit No.	#42
Witness	Pana #1
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SUPPLEMENTAL

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities

DG 14-380

Petition for Approval of a Firm Transportation Agreement with the Tennessee Gas Pipeline Company, LLC

Pipeline Awareness Network of the Northeast ("PLAN") Data Requests – Set 2

Date Request Received: 4/1/15  
Request No. PLAN 2-27

Date of Response: 6/9/15  
Respondent: Francisco C. DaFonte

**REQUEST:**

In the technical session of March 17, 2015, Mr. DaFonte discussed the relative environmental impacts of the KM Pipeline with respect to the other competing pipeline proposals. Please provide any analyses or other documentation that EnergyNorth considered, prepared, and/or reviewed with respect to the environmental impacts of the KM pipeline and/or other pipelines proposed in New England, including the C2C and Spectra proposals.

**OBJECTION:**

The Company objects on the basis that the request seeks information that is not relevant to the proceeding or reasonably calculated to lead to the discovery of admissible evidence. The purpose of this docket is to determine whether EnergyNorth's Precedent Agreement with Tennessee Gas Pipeline Company, LLC is in the public interest, not an examination of environmental impacts associated with the construction of the NED natural gas pipeline project.

The Company further objects on the basis that PLAN's intervention is limited to "the interests of its EnergyNorth-customer members in the prudence, justness and reasonableness of the Precedent Agreement and its associated costs, to EnergyNorth and its customers." The Commission expressly denied PLAN's "...intervention on behalf of landowners along the proposed TGP route who are not EnergyNorth customers. Only EnergyNorth-customer members possess "rights, duties, privileges, immunities or other substantial interests [that] may be affected by the proceeding." RSA 541-A:32, I (b). It will be EnergyNorth customers who will bear the costs of the Precedent Agreement if the Commission approves it. PLAN's landowner members possess no such direct interest or cost responsibility; their interests, while important, are not pertinent to the Commission's determinations in this proceeding. Consequently, it is likely that the participation of PLAN landowner members would "impair the orderly and prompt conduct of [these expedited] proceedings." RSA 541-A:32, II. To ensure an orderly and focused proceeding, we limit PLAN's participation to the interests of its EnergyNorth-customer members in the prudence, justness and reasonableness of the Precedent Agreement and its associated costs, to EnergyNorth and its customers." Order No. 25,767 at 4.

**SUPPLEMENTAL RESPONSE:**

In follow up to the Commission's Order No. 25,789 dated June 5, 2015, the following documents were considered by the Company in making its statement at the technical session on March 17, 2015:

The Kinder Morgan presentation to NESCOE wherein it compares the environmental and landowner impacts of a greenfield pipeline project to the "lift and lay" construction process required to expand an existing pipeline  
([www.kindermorgan.com/content/docs/NED\\_NESCOE\\_presentation.pdf](http://www.kindermorgan.com/content/docs/NED_NESCOE_presentation.pdf))

The Boston Globe article on the FERC approval of Spectra's Algonquin Incremental Market pipeline expansion project and the ongoing battle with the residents of West Roxbury, Massachusetts (<http://www.bostonglobe.com/business/2015/03/04/west-roxbury-pipeline-approved-federal-regulators/puwUH9qetjbBejcSBFJi9M/story.html>)