

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

Docket No. DG 17-XXX

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities  
Winter 2017/2018 Cost of Gas Filing  
Summer 2018 Cost of Gas Filing

**DIRECT TESTIMONY**  
**OF**  
**MARY E. CASEY**

August 29, 2017

THIS PAGE INTENTIONALLY LEFT BLANK

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 Environmental Program Manager for Liberty  
4       Utilities 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 as part of the Company's cost of  
5 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, as previously ordered by  
12 the Commission, in August 2017 the Company held a technical session with the  
13 Commission Staff and the Office of Consumer Advocate to keep them apprised of the  
14 status of site investigation and remediation efforts, as well as cost recovery efforts against  
15 third parties.

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

19 A. The project has been completed since December 2015. The site is stable and the grass is  
20 mowed twice a year. The Notice of Activity and Use Restriction (AUR) was approved  
21 by NHDES and recorded at the Belknap Registry of Deeds in February 2017. The  
22 groundwater wells are monitored and sampled once a year per the new Groundwater

1 Management Permit that was obtained from NHDES in May 2017. This post-  
2 remediation permit involves sampling fewer wells with half the frequency.

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

5 A. A Remedial Design Report for the on-site and off-site impacts was finalized and  
6 submitted to NHDES on December 19, 2014. The on-site activities will include further  
7 investigation and remediation of areas showing localized contamination. The off-site  
8 design will involve installation of extraction and monitoring wells to continue monitoring  
9 any migration of contamination between the site and the Merrimack River. NHDES  
10 accepted the proposed remedial design, adding activities involving further investigation  
11 of historical Holder 3 and the on- and off-site drainage system. The Company plans to  
12 undertake on-site removals, monitoring well installations and drain improvements in  
13 2017, prior to yard paving in Fall 2017.

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

16 A. NHDES approved the Remedial Action Plan (RAP) submitted in March 2015 on May 29,  
17 2015, with the condition that the brick gas holder house either be restored, so as to act as  
18 a functioning cap, or razed and the soils beneath it remediated. Various small-scale  
19 investigation activities, including removal of shallow soils displaying MGP-related  
20 residual impacts, investigation and remediation of remaining known subsurface  
21 structures, capping of components of the local storm water drainage system, and  
22 installation of soil vapor probes were performed in December 2015. A Remedial Design

1 Report (RDR) was submitted to NHDES on March 16, 2016, summarizing the remedial  
2 design investigations. The Company has met with NHDES and City of Concord officials  
3 to discuss the options for the brick gas holder, as it works into the remedial design. In  
4 early 2016, the Company was approached by a commercial developer who is interested in  
5 purchasing the property and repurposing the holder house structure. Several site  
6 meetings have taken place with the developer, and EnergyNorth received their conceptual  
7 design plan. In late summer 2017, the Company plans to complete various final  
8 subsurface remedial activities that need to occur prior to capping.

9 The design for the remediation of the east side of I-93 (Concord Pond) was finalized in  
10 early 2016, incorporating the City's concerns regarding maintenance of the storm water  
11 outfall. The Company presented the amended remedial design to the City in February  
12 2016, and the City agreed to the design, along with a rigorous schedule toward a  
13 construction date in late summer 2017 when the pond area is driest. Since the City has  
14 not given access to their storm water system, the projected implementation continues to  
15 move out and will not occur any earlier than late summer 2019.

16 In 2017, the Company received approval from NHDES on a near-bank sediment  
17 sampling program in the Merrimack River, or Monitored Natural Recovery (MNR). This  
18 program involves annual sediment sampling for contaminants and river bathymetry  
19 studies to monitor both the chemical and physical behavior of sediments than may have  
20 been impacted by coal tar wastes. There will be five annual samplings commencing in  
21 2017.

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

3 A. The Company submitted the draft Activity and Use Restriction (AUR) and final  
4 engineering design plan for the cap, per the RAP provisions, in September 2015.  
5 NHDES altered the cap design to include an impermeable capping layer, and  
6 incorporation of standards in the Waste Management Bureau's Asbestos Disposal Site  
7 rules. The cap will be installed in conjunction with a capital paving project for this  
8 property in 2018.

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

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

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

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

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

17 **Q. What environmental remediation efforts do you anticipate for the remainder of**  
18 **2017 and in 2018?**

19 A. At the Manchester MGP site, we will finalize the RAP, based on a final set of comments  
20 from the NHDES on our remedial design and construction specifications, expected in  
21 2017. The Company will commence remediation of localized areas of contamination on-

1 site, the installation of monitoring and extraction wells on the off-site property, and  
2 improvements to the on-site drainage system prior to site paving in 2017. At the Concord  
3 MGP site, the Company will continue to negotiate the terms of sale with the interested  
4 developer regarding the design of the capping remedy, relative to proposed future use,  
5 and ongoing environmental site monitoring. For the Concord Pond site, the Company  
6 will continue to attempt to engage the City for access to the stormwater system and City  
7 property so the pond area can be remediated per the approved design. The monitoring of  
8 near bank sediments will commence in 2017 per the NHDES-approved Monitored  
9 Natural Recovery plan. At the Nashua MGP site, we are targeting 2018 for paving to  
10 commence as part of the RAP design, upon final approval of the cap design and Asbestos  
11 Disposal Site work plan by NHDES. All sites are also now in the monitoring phase, so  
12 groundwater monitoring will occur at all of them under their respective Groundwater  
13 Management Permits.

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

15 **A.** Yes, it does.