

**Susan L Durling, Nonviolent Direct Action Coordinator,  
Lead – Health Impacts and Emissions**  
ECHO Action NH: #FossilFree603  
212 Gould Pond Road, Hillsborough, NH 03244

March 10, 2018

Debra Howland  
Executive Director and Secretary  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301  
executive.director@Puc.nh.gov  
Puc@Puc.nh.gov  
RE: DG 17-198 Liberty Utilities Granite Bridge Project

Dear Ms. Howland,

This is a request for information pursuant to PUC 104 and PUC 201.07. Please file this letter as a public comment.

I am writing to you on behalf of ECHO Action and our members. We represent utility ratepayers who are opposed to gas expansion throughout the state. Our members are citizens who support a #FossilFree603, 100% renewable energy Granite State.

I request unredacted copies of all documents that Liberty Utilities has submitted in support of its Granite Bridge petition, as identified in its motion for protective order. For the reasons explained in the opposition to that motion, filed by the Office of Consumer Advocate, I ask that the motion for protective order be denied and unredacted copies be made public immediately.

Our organization formed in 2014 in response to the proposed Northeast Energy Direct pipeline by Kinder Morgan/Tennessee Gas Pipeline. We have been following Liberty Utilities' aggressive push for gas expansion. The public has a right to view all documents related to Libertys' expansion plans throughout the communities of New Hampshire and to be fully informed of the impacts and consequences of their proposed construction and distribution of natural (fracked) gas. The public must be allowed to evaluate, research, discuss, consider and respond to all of the details of Liberty Utilities' Granite Bridge Pipeline proposal, if there is to be any confidence that the public interest has been served.

Liberty Utilities is proposing a capital investment of almost \$312 million for Granite Bridge, which would be passed along to ratepayers during the projected 55-year life span for the pipeline, and 40-year life span for the LNG facility. New Hampshire is a signatory to the Under2 Memorandum of Understanding, under which signatory governments made a commitment to reduce their greenhouse gas emissions towards net-zero by 2050. New Hampshire's renewable energy commitment is dangerously low and our dependence on natural gas is already over 50%. Gas expansion is a threat to life in New Hampshire as we know it. This proposal would directly affect New Hampshire's ability to reduce greenhouse gas emissions.

Liberty Utilities has asked the PUC for permission to extend its gas franchise into Lebanon, Hanover, Keene and now Manchester, Auburn, Candia, Raymond, Epping, Brentwood, Exeter and Stratham. These communities are not in desperate need of the gas. There is no need for Liberty Utilities to fast-track permitting of this pipeline and to do so behind closed doors without transparency and public approval.

In Lebanon and Hanover, DG 16-852, the company also claimed that a large amount of information needed to be withheld from the public. On April 3, 2017, community intervenors Ariel Arwen and Jonathan Chaffee, representing themselves, filed an objection to the company's motion for protective order and argued that the information needed to be made public. They documented instances where redacted information was already in the public record and noted that the public has no way of knowing if the company is misrepresenting known facts. The commission declined to rule on that objection. Now almost 11 months after that objection was filed and more than five and a half months since the hearing on that case, the commission has still not ruled on whether Liberty has abused New Hampshire's right-to-know law, RSA 91-A:5.

The commission has established pattern of concern, taking Liberty's word that their information should be confidential and not ruling on that question until after the final order is issued. The public is then left without the opportunity to respond to a decision of vital importance to their community, health, safety and future. That is unacceptable.

I ask that the commission take this opportunity to establish transparency in its proceedings and release the redacted documents immediately and to continue to release any and all documents in relation to this and any other gas expansion projects in New Hampshire.

Thank you for taking the time to thoroughly consider the impact of this decision.

Sincerely,

A handwritten signature in black ink, appearing to read "SLDurling".

Susan L. Durling

cc: D. Maurice Kreis, Consumer Advocate, [donald.kreis@oca.nh.gov](mailto:donald.kreis@oca.nh.gov)