

April 15, 2018

Debra Howland  
Executive Director and Secretary  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301

RE: DG 17-198 Liberty Utilities Granite Bridge Project

Dear Ms. Howland,

There are many reasons to reject the Liberty Utilities Granite Bridge Project, DG 17-198. Please consider the concerns expressed in this comment in response to their proposed expansion of unconventional natural gas and its infrastructure within our state.

Liberty Utilities (LU) efforts to rush the approval process for this project are indicative of their disregard for NH's Right to Know law and the welfare and rights of NH's citizens and ratepayers. Without effective oversight and responsible checks on their attempt to by-pass a rigorous and thorough approval process, the interests and rights of the impacted communities would be left in the dust.

Focusing on one of the PUC's principal concerns, "saving ratepayers money", exemplifies this. LU's portrayal of the financial rewards for ratepayers if their Granite Bridge project is allowed to proceed, is that it will provide customers with the "cheapest" fuel on the market. But an elementary math check and reasonable consideration of other relevant factors highlight the fundamental flaws in that claim. In fact, it is based on a combination of grandiose and faulty speculation, as illustrated in other Comments on this docket, plus either incompetent or deliberately fallacious ("fuzzy") math:

- Capital costs for Infrastructure construction are entirely omitted from their price calculations. But NH's ratepayers know better.
- LU's price calculations for their fuel are based on the blatantly false assumption and sheer speculation that the presently low cost of fractured natural gas will be sustained over time. But NH ratepayers know better.
  - 1) We had a problematic and costly ride on their pricing roller coaster, including jumps and drops by 40%, from 2013 to the present.
  - 2) LU ignores the common understanding that price volatility becomes more of a concern for energy sources that command over 50% of the market share. Natural gas is already at over 50 %.
  - 3) LU ignores the EIA predictions for **US prices for natural gas to rise as the industry's higher profit margins kick in from the increasing overseas exports.**

- LU ignores, but we should NOT, the obvious eventual stranded costs for abandoned infrastructure and/or its removal when all fossil fuels have been rejected by federal or state mandates- speculated to potentially be within 5 years.
- LU ignores, but NH should NOT, the costs which are always charged to ratepayers for the "lost gas" when pipeline and other infrastructure leaks occur. 20,000 pipeline leaks were discovered in MA, 5,000 in Boston alone, according to Harvard University researchers. And the costs to towns' FDs are also ignored, but NH's municipalities should NOT, as the gas leaks in Keene have shown in 2015, 2016, and 2017. Yale University researchers and others have discovered that close to 3% of produced fractured gas escapes into the atmosphere from pipeline, storage tank, LNG plant leaks and compressor and metering station emissions. In fact, new pipelines are leaking as much as the oldest pipelines from the '50s, and pipeline storage tank and compressor station accidents, spills, fires and explosions continue to add up, according to PHMSA.
- Additionally, the extraordinary financial costs to NH's towns and ratepayers created by the effects of climate change are totally ignored and invisible in their calculations. But should not be by NH.
  - 1) LU continues to promote the myth that fractured natural gas is the best investment due its being a "cleaner fuel", despite the reality that its methane is 86 times more powerful than ANY other fuel for heating up the atmosphere in its first 20 years, even though its CO2 content is lower. Actually, the processes which transform the gas into LNG also cause its CO2 content to rise. NH needs to stand clear of LU's myth.
  - 2) The damage to coastal towns and beach erosion; dairy closures and wells running dry from droughts; impacts on the tourist industry from our Maples moving northward and diminished hunting from the exploding tick population killing our moose and deer, etc.; plus the cost of road and bridge repairs from multiple "100 year floods", and the cost of storms like the one PSNH called, "the most expensive storm in its history " -- the 2008 Ice Storm with its 14 day power outage, all drive home how clearly the **lengthy power outages and damage repairs from increasingly intense storms are much more costly than an occasional "brown out" from any rare dip in power supply caused by inadequate ISO-NE grid management.**
- LU's price calculations also ignore the reality that, even with their presently low pricing for fractured natural gas, solar power is now the cheapest long-term power source available.

These pricing concerns must be added to all of the other problems posed by the Granite Bridge proposal, including its obvious conflict with the priority of supporting NH's growing clean energy industry providing good jobs that keep our energy investments in-state; Granite Bridge's clear opposition to NH being a signatory for the "Under2Memorandum of Understanding", committing us to

reduce GHG emissions toward net-zero by 2050 as well as the requirements under R.S.A.378:37 to protect the environment, health and safety of citizens in NH's energy choices.

Please respect the concerns expressed in this comment and reject the Granite Bridge proposal. It is in direct opposition to important NH statutes and the interests, priorities and wellbeing of our communities and ratepayers.

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