

Subject: Docket DG 14-380

July 14, 2015

Debra Howland,
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Ms. Howland,

I am a State Representative of New Hampshire representing District 37 of Hillsborough County, resident of the town of Pelham. I am submitting this letter on behalf of a constituent.

The following are questions I would like answers to, made public before any formal decisions regarding the precedent agreement between Liberty Utilities and Tennessee Gas Pipeline are finalized:

I would like to know the size of the existing pipelines of the Tennessee Gas Pipeline system through Massachusetts. Are these pipeline already carrying natural gas from the Marcellus shale to the New England region?

Where on the Concord Lateral pipeline system in New Hampshire are "bottlenecks" occurring? I would like these areas delineated on a *detailed* map of the entire Concord Lateral pipeline network beginning in Dracut, MA with all of its accompanying laterals and distribution lines. The map must be current as of 2015 and show all of the most recent area development alongside the Concord Lateral.

Nashua, New Hampshire has 25, 276 residential natural gas customers and 2, 497 commercial natural gas customers (numbers from Nashua Regional Planning Commission website). The existing lateral line that services Nashua, New Hampshire is 8-inches in diameter. I suspect this might be one of the "bottlenecks." Is that assumption correct? Is the Nashua Lateral, off the Concord Lateral considered a "bottleneck?" Would that "bottleneck" be fixed if the 8-inch pipeline were upgraded to a 12-inch or even a 14-inch pipeline? Kinder Morgan representatives have told residents in Hudson, Pelham, Londonderry and Windham that the Concord Lateral easement has been built up against too much to allow any expansion. Is that true? Is that true for the Nashua lateral running through the town of Hudson, New Hampshire? Is that true for the existing Tennessee Gas Pipeline transmission main lines through Massachusetts?

If there is a smaller-cost solution to remedy a situation for price spikes which occur literally only a few days out of the entire year, is the Federal Energy Regulatory Commission the regulatory body that oversees bringing the people the smallest cost alternative? Is the Public Utilities Commission the state regulatory body responsible for ensuring the smallest cost alternative for the people? Have either of these agencies asked Kinder Morgan / Tennessee Gas Pipeline where the Nashua plan for the Northeast Energy Direct pipeline has gone and why? To be clear I am not recommending routing through Hollis, NH again. I am merely pointing out that plans for reaching Nashua and all points out from Nashua are seemingly missing from the preferred proposal being set forth by Kinder Morgan. In missing that, we are

having difficulty with understanding how, regardless of whether the Liberty Utilities docket DG 14-380 is approved or denied at the PUC, service to these areas will be “made more reliable.”

Incremental upgrades, such as a replacement of 8-inch pipe with 12-inch, should be made to the pipeline systems already in place in New Hampshire and Massachusetts before the multi-billion-dollar construction of a new and very large transmission pipeline. How will a new and very large pipeline remedy price spikes if it will do nothing to correct “bottleneck” points on the existing pipeline system? When the Northeast Energy Direct project was to be routed in Massachusetts, there was a new Nashua lateral proposed. It was the only piece of the Northeast Energy Direct pipeline system that poked up into our state. Now that such a large portion of the Northeast Energy Direct has come north of the state border I can’t help but notice the proposed Nashua lateral has disappeared. We would like a descriptive explanation about how the Northeast Energy Direct project as it stands now, is planning on getting more of the gas to Nashua. Is that still a priority?

Are there concrete plans for Liberty Utilities customer expansion at this time? I have read that a mile of new distribution pipelines costs about \$1 million. Is that figure accurate? Kinder Morgan has told Pelham, New Hampshire that Liberty Utilities is planning on servicing our town, that Liberty Utilities has told Kinder Morgan very clearly that Pelham is on their radar and that they are taking action to serve our town already. Is that statement accurate? (made by Curtis Cole at our March 26 Pelham Town Hall meeting) Is natural gas distribution for home heating feasible for small towns zoned for one-acre lots?

We keep hearing from Kinder Morgan representatives that their project is in response to “demand.” With 27,773 natural gas customers in Nashua, does that city constitute a large piece to what Kinder Morgan is calling a “demand?” Of the towns represented by the Nashua Regional Planning Commission, Hudson, New Hampshire is the second largest for natural gas customers with a total residential and commercial customers combined of 5,218. Is Hudson, New Hampshire also fed off of that 8-inch existing Nashua lateral? Is Merrimack, New Hampshire with 3,742 natural gas customers fed off of that 8-inch existing Nashua lateral? BAE Systems is located in Hudson, Merrimack and Nashua. BAE has been specifically sited by Kinder Morgan in their Town Hall informational meetings as part of the region’s “demand” for natural gas. Would BAE Systems also be fed off of that 8-inch existing Nashua lateral? In addition to Hudson, Merrimack and Nashua, there are 534 natural gas customers in Amherst, 29 natural gas customers in Hollis, 116 natural gas customers in Litchfield, and 1,025 natural gas customers in Milford. Are all of those 38,437 customers fed from the existing 8-inch Nashua lateral?

Again, I would like to know where all the specific “bottleneck” locations are on the Concord Lateral in New Hampshire, and all locations where “bottleneck” claims are occurring in Massachusetts as well as whether gas from the Marcellus Shale is already traveling through the Tennessee Gas Pipeline system through Massachusetts and what the size of those transmission pipelines are. Could any of those transmission main lines through Massachusetts be upgraded with a larger pipeline within the existing Tennessee Gas Pipeline easement through Massachusetts? In addition, I would like a comprehensive explanation as to how the Northeast Energy Direct pipeline proposal will remediate those “bottleneck” locations.

Again, I would like to see a very detailed and up to date map issued for the Concord Lateral and its accompanying distribution lines; a comprehensive map of the Concord Lateral in its entirety with the capability to zoom in to see all of the houses and structures along the way. I would also like a compiled package of every PUC and FERC filing and ruling regarding every upgrade made on the Concord Lateral pipeline system over its lifetime to date to be made public within this docket DG 14-380. In 2008 Pelham, New Hampshire became the site for compressor station 270B. I would like to know why this compressor station is "rarely in use" as we have been told at numerous town hall meetings with Kinder Morgan. Is the Concord Lateral pipeline system being fully utilized? This is a question that must be examined before new agreements are made that will lead to construction of a new and expensive pipeline through our state. Where are the storage facilities along the Concord Lateral pipeline system? Are the storage facilities being fully utilized? Would another storage facility in New Hampshire (sited near Granite Ridge natural-gas fired power plant in Londonderry, for example) be a more cost-effective solution to the winter-reliability of energy in New Hampshire than a multi-billion-dollar pipeline construct would be?

For the sake of transparency, we must *all* in New Hampshire understand this Concord Lateral pipeline system's deficiencies before we can decide the level of investment we should make into expanding natural gas infrastructure in our state. Or should we instead be making appropriately sized upgrades to the Concord Lateral for winter-reliability? For this reason, I am hoping that my request for answers to all of my questions and detailed maps are presented and made public within this docket DG 14-380, preferably with a chance for cross-examination by the PUC staff, OCA, and PLAN NE attorney, for accuracy.

Thank you for your consideration,

Representative Charlene F Takesian
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