



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

Docket No. DG 18-XXX

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities  
Winter 2018/2019 Cost of Gas Filing  
Summer 2019 Cost of Gas Filing

**DIRECT TESTIMONY**

**OF**

**MARY E. CASEY**

August 31, 2018

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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 Senior Manager, Environment, for Liberty Utilities  
4 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 and Ms. McNamara as part of the  
5 Company's cost of 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 2018 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 NH Department of Environmental Services ("NHDES") and recorded at the Belknap

1 Registry of Deeds in February 2017. The groundwater wells are monitored and sampled  
2 once a year per the new Groundwater Management Permit that was obtained from  
3 NHDES in May 2017. This post-remediation permit involves sampling fewer wells with  
4 half the frequency.

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

7 A. On-site activities in the past year included further investigation and remediation of areas  
8 showing localized contamination, as described in the December 2014 Remedial Design  
9 Report approved by NHDES. These remediation activities included further investigation  
10 of historical Holder 3 and the on- and off-site drainage system. The Company removed  
11 contaminated materials from three historic MGP units, and installed monitoring wells in  
12 one of the former holders, as requested by NHDES, prior to yard paving in Fall 2017.

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

15 A. In early 2016, the Company was approached by a commercial developer who was  
16 interested in purchasing the property and repurposing the holder house structure. Several  
17 site meetings took place with the developer, however, their current level of interest is  
18 uncertain as the Company has not heard from them since the fall of 2017.

19 In early 2018, the Company met with the newly appointed City Engineer regarding the  
20 latest design for the remediation of the east side of I-93 (Concord Pond). After several  
21 discussion and site visits, the Company and City are moving toward a remedy that will

1 also allow the City to access their storm water system for maintenance on the east side of  
2 the highway where the wetland cap will be constructed. A design involving wetland and  
3 subaqueous capping is being finalized.

4 In 2017, the Company received approval from NHDES on a near-bank sediment  
5 sampling program in the Merrimack River, or Monitored Natural Recovery (MNR). This  
6 program involves annual sediment sampling for contaminants and river bathymetry  
7 studies to monitor both the chemical and physical behavior of sediments that may have  
8 been impacted by coal tar wastes. There will be five annual samplings, the first of which  
9 was conducted in October 2017.

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

12 A. In 2016, NHDES altered the cap design to include an impermeable capping layer and  
13 incorporation of standards in the Waste Management Bureau's Asbestos Disposal Site  
14 rules. The details of this cap are being finalized and construction is planned for 2019, in  
15 conjunction with a capital paving project for this property. At last report, cap  
16 construction and paving were to occur in 2018, but a February 2018 collapse of a sewer  
17 pipe that transects the property moved the cap installation back by a year to allow for the  
18 City to repair its sewer line.

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

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

1 In May 2017, the NHDES requested by letter that all active hazardous waste sites  
2 managed by the Hazardous Waste Remediation Bureau include sampling for Per- and  
3 Polyfluoroalkyl Substances (PFAS) in one of their groundwater sampling rounds, as part  
4 of a statewide study of these compounds. All EnergyNorth sites fulfilled this request  
5 during regularly scheduled sampling in 2018. At most sites, the compounds were not  
6 detected, however, readings for these contaminants at the Concord Pond site have  
7 prompted the NHDES to request PFAS inclusion in another sampling round.

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

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

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

13 **Q. What environmental remediation efforts do you anticipate for the remainder of**  
14 **2018 and in 2019?**

15 A. At the Manchester MGP site, the Company will continue remediation of localized areas  
16 of contamination on-site, the installation of monitoring and extraction wells on the  
17 downgradient side of the property, and testing of two new recovery wells that were  
18 installed in 2017. At the Concord MGP site, the Company will continue to seek out  
19 interested developers to re-purpose the building and property, and continue  
20 environmental site monitoring. For the Concord Pond site, the Company will continue to  
21 work with the City to design and construct the wetland cap remedy per the approved

1 design, and that will allow the City access for maintenance of the storm water outfall.  
2 The monitoring of near bank sediments will continue in 2018 per the NHDES-approved  
3 Monitored Natural Recovery plan. At the Nashua MGP site, the Company is targeting  
4 2019 for capping and paving to commence, upon final approval of the cap design and  
5 Asbestos Disposal Site work plan by NHDES. All sites are also now in the monitoring  
6 phase, so groundwater monitoring will occur at all of them under their respective  
7 Groundwater Management Permits.

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

9 A. Yes, it does.