EXHIBIT

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Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities

DG 18-092

Petition for a License to Construct and Maintain a Gas Pipeline Beneath the Ashuelot River in Keene

Clark Data Requests - Set 2

Date Request Received: 10/18/18

Request No. Clark 2-1

Date of Response: 11/1/18

Respondent: Andrew Mills

REQUEST:

Reference paragraph 9 of Liberty's petition in this proceeding. Please identify all reasons that Liberty contends that the proposed crossing is "critical to the economic ... upgrade and repair of the existing river crossing at West Street."

RESPONSE:

When determining how to repair or replace the West Street bridge crossing, Liberty Utilities considered and priced several options, taking into account the age of the pipe on the West Street bridge and the age of the bridge itself. Due to the existing poor condition of the bridge and that the crossing is currently a one-way feed, shutdown of the existing pipe was not possible. The estimate provided in the Company's response to Clark 1-18 for replacing the crossing in kind, was one option considered. The Company also considered the insertion of new plastic pipe into the existing steel pipe hanging on the West Street bridge. This option was not acceptable because a smaller pipe would have to be used and, due to flow conditions, a smaller pipe would not be sufficient to handle peak flow in the winter. This insertion option was estimated to cost approximately \$30,000. After receiving the two estimates, the estimate in response to Clark 1-18 and the estimate here, the Company began exploring the installation of a second crossing, and solicited HDD bids for the proposed crossing that is now the subject of this proceeding. Based on the estimate for the HDD, as provided in response to Clark 1-17, an HDD in conjunction with an insertion approach was determined to be the most economical way to proceed. A larger pipe is no longer needed for the insertion because the second crossing and back feed solves the flow condition issue. A second crossing also provides redundancy and reliability benefits. Thus, the Company determined that the proposed repair of West Street crossing and installation of the new Winchester Street crossing is the most prudent course.