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Via Hand-Delivery and Electronic Mail

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

Re: Docket No. DG 17-068; Liberty Utilities (EnergyNorth Natural Gas) Corp. -- Keene Division

Dear Ms. Howland:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty Utilities – Keene Division, I write to provide the information required by Order No. 26,274 (July 26, 2019) (the “Order”), as clarified by Order No. 26,294 (Sept. 25, 2019) (the “Rehearing Order”).

First, the Order required the Company to file “its operations and maintenance plans for the conversion and operation of the proposed natural gas system.” Order at 15. Enclosed with this letter are seven copies of the following documents:

- CNG Operating Procedures
- CNG Maintenance Procedures
- Keene Conversion Plans

Second, the Rehearing Order directed the Company “to file a comprehensive report of the costs associated with the Company’s efforts to convert the initial portion of the system to CNG (at the Monadnock Marketplace).” Rehearing Order at 15.

The table below itemizes the costs incurred to date to install of the CNG station itself (which will be available to serve current and future CNG customers), to install the new main and associated infrastructure that runs from the CNG station to the existing distribution system (which will serve all future natural gas customers from the planned Production Avenue facility), and for the just-completed conversion of the Monadnock Marketplace customers from propane-air to CNG. A detailed description of the cost categories can be found beneath the table. Note that charges are still coming in from the recent work, so the “Total Estimated Spend” column was added to indicate the Company’s expectation of final costs.

	Internal Labor	Materials	Vouchers	Burden	AFUDC	Total to Date	Total Estimated Spend
43C18821-18301 CNG Station	\$96,624.06	\$4,032.04	\$484,329.84			\$584,985.94	\$675,000
43C18821-18303 New Main	\$55,312.50	\$5,642.93	\$231,814.53	\$151.63	\$21,729.51	\$314,651.10	\$330,000
43C18821-18304 Conversion	\$4,738.03		\$74,029.98			\$78,768.01	\$90,000
Grand Total	\$156,674.59	\$9,674.97	\$790,174.35	\$151.63	\$21,729.51	\$978,405.05	\$1,095,000

43C18821-18301- CNG Station (COG). This job number tracks all charges associated with the new CNG station at 43 Production Ave. It includes the design, permitting, and installation of the CNG decompression skid along with costs for fencing, lighting, piping, and site paving to the property line.

43C18821-18303- CNG Conversion Outside (Capital). This job number tracks all charges associated with the installation of the main from the property line (CNG skid) to the existing propane air system on Ashbrook Road. Charges also included the installation of valves and purge points prior to the conversion. For the conversion itself, this job number tracks charges to purge the propane air out of the gas main, pressure testing, and the purge in with natural gas from the CNG station. This number was also used to track charges associated with rebuilding all meter sets associated with the conversion.

43C18821-18304- Customer Conversion Inside (Expense). This job number tracks all conversions of customer appliances from propane air to natural gas.

Thank you.

Sincerely,



Michael J. Sheehan

Enclosures
 cc: Service List