

SUPPLEMENTAL

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

DG 20-152
Winter 2020/2021 Cost of Gas

Staff Data Requests - Set 1

Date Request Received: 9/24/20
Request No. Staff 1-6

Date of Response: 10/19/20
Respondent: Deborah Gilbertson

REQUEST:

Ref. Order 26,305 (October 31, 2019, Docket No. 19-153), p. 9, “**Further Ordered** that Liberty-Keene track and report incremental natural gas savings and costs in COG reconciliations to be determined by comparing the individual CNG and LNG supply cost at the time of delivery with spot propane prices at that time.” (Emphasis in original), *see id.* pp. 8-9. For winter 2019-2020 Please provide a schedule with the following information (volume per therm):

- a. Date of each CNG delivery
- b. Volume of each CNG delivery
- c. Cost of each CNG delivery (all invoiced charges including demand charges)
- d. Cost per therm for each CNG delivery
- e. Average cost per therm for total CNG delivered
- f. Total CNG cost in the 2019-2020 winter COG reconciliation
- g. Propane spot price (Mont Bevier) at the time of each CNG delivery
- h. Cost per therm of propane as calculated in Schedule E of the 2019-2020 winter COG filing using the actual spot prices at the time of each CNG delivery.
- i. Comparison of monthly and total 2019-2020 CNG costs and propane costs as calculated above for CNG costs incurred in the winter 2019-2020 and for CNG costs in the 2019-2020 winter COG reconciliation.
- j. Please provide an identical analysis for the forecasted CNG usage.

RESPONSE:

Please see Confidential Attachment Staff 1-6.

Note: CNG operates as a portable pipeline system. It is vaporized directly into the distribution system. Deliveries are measured as daily metered volume and are paid for on a monthly basis. CNG is dissimilar to propane where, with propane, deliveries are purchased by truckload and stored in tanks.

The Company interprets 1.6.h to mean Staff is looking for the Company to update Schedule E components using actual spot propane prices. Please see the Company's response to OCA 1-5 which addresses this.

Confidential Attachment Staff 1-6 contains pricing and other information that is "confidential, commercial, or financial information" that is protected from disclosure by RSA 91-A:5, IV, and presumed to be confidential in cost of gas proceedings pursuant to Puc 201.06(a)(11). Therefore, pursuant to that statute, Puc 203.08(d), and Puc 201.01.06(a)(11)(g) (protecting "responses to data requests related to a. through f. above"), the Company has a good faith basis to seek confidential treatment of this information and asserts confidentiality pursuant to those rules.

SUPPLEMENTAL RESPONSE:

In Staff's first set of Technical Session data requests, Staff asked the Company to provide the following in reference to Liberty Utilities-Keene (LU-K) response to Staff DR 1-6:

Staff TS 1-1: Please provide the supporting documentation for the April 2020 compressed natural gas (CNG) cost, including CNG invoice(s), and explain how the CNG provider calculates each charge. For index pricing, please also provide a copy of the supporting source document(s). Please include live Excel spreadsheets if relevant

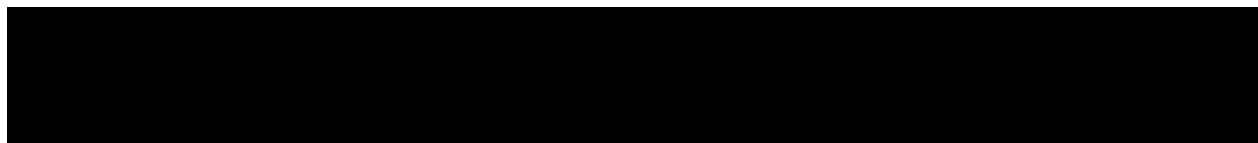
Staff TS 1-4: Please calculate the COG rate and exclude both the CNG demand charges incurred prior to October 2019 and the incremental cost of CNG for winter 2019-2020 as calculated in response to Staff DR 1-6.

After further review of the Company's response to Staff 1-6, the Company notes that some volumes provided in Confidential Attachment Staff 1-6 were taken from preliminary, and not actual data.

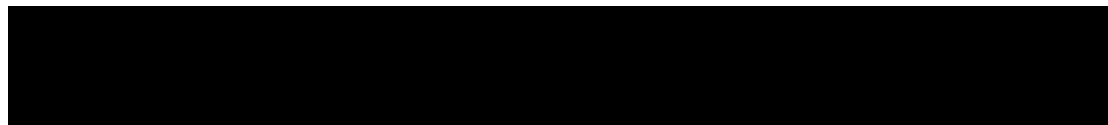
Please see Confidential Attachment Staff 1-6-REVISED.xlsx, in which actual volumes have been updated and will be used as the basis for information the Company provides in its response to Staff TS 1-1 and Staff TS 1-4. Please note, the per unit comparison price did not change in any material manner (i.e., March and April were lowered \$0.01).

The Company incorporates the above assertion of confidentiality as to Confidential Attachment Staff 1-6-REVISED.xlsx.

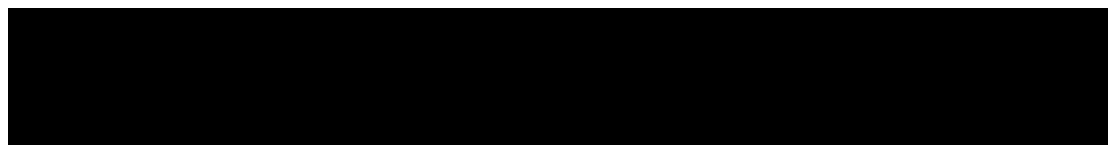
	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	TOTAL
Actual CNG Costs incurred in winter 2019-2020							
<u>CNG DELIVERIES</u>							
Therms	23,910	34,530	34,050	31,700	23,920	17,720	165,830



	CNG Cost Per 2019-2020 Reconciliation						
<u>CNG DELIVERIES</u>							
Therms	23,910	34,690	34,020	31,700	23,920	17,720	165,960



	CNG Forecasted Cost Per 2019-2020 Winter Cost of Gas						
<u>CNG DELIVERIES</u>							
Therms	14,909	24,575	47,768	33,811	23,455	26,238	170,756



	Actual Spot Propane Costs incurred in winter 2019-2020						
<u>Spot Propane Purchase</u>							
Therms	63,040	53,014	12,977	35,388	36,658	26,219	227,296
COST per therm	\$1 0092	\$0.9928	\$0.8841	\$0 8429	\$0 6191	\$0.8040	\$0.8858
TOTAL COST - Spot Purchases	\$63,622	\$52,631	\$11,473	\$29,830	\$22,695	\$21,080	\$201,331

<u>Comparison Actual CNG Cost Vs Actual Spot Propane</u>	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	
---	---------------	---------------	---------------	---------------	---------------	---------------	--

