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 1-9

Date of Response: 10/5/20 Respondent: Deborah Gilbertson

<u>REQUEST</u>:

Ref. Order 26,241 (April 29, 2019) p. 6 "We reiterate our prior conclusion that, as Liberty introduces fuels other than propane in Keene, the Company's COG filings should clearly detail those fuels. We direct that in future Liberty-Keene filings, both fuel types and costs for each fuel <u>shall be specified in summaries</u> as well as in discrete schedules." (Emphasis added). Please update Liberty-Keene's filing as necessary to meet this requirement. For example, please provide a version Bates p. 22 (Schedule A) showing information for each fuel type.

RESPONSE:

Please see Confidential Attachment Staff 1-9, which shows Schedule A as updated to include both CNG and Propane volume and unit cost. Please note that supply plan schedules B, C, F, and G separate the fuel type and clearly identify the cost of each. Schedule A was put in place to provide a conversion factor from gallons to therms. The Company now provides most data in therms for ease of comparison and to reduce confusion. The Company would like to eliminate Schedule A altogether in future filings since it is not necessary and the data can be found on multiple other schedules.

Confidential Attachment Staff 1-9 contains pricing and other information that is "confidential, commercial, or financial information" 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.

DG 20-152 Exhibit 13 REDACTED REDACTED Docket No. DG 20-152 Attachment Staff 1-9 SCHEDULE A

LIBERTY UTILITIES - KEENE DIVISION

CONVERSION OF COSTS - GALLONS TO THERMS WINTER PERIOD 2020 - 2021

	(1)	(2)	(3)	(4)	(5)	(6)
			VOLUMES		UNIT COST	
	<u>UNIT</u>	CONVERSION FACTOR	<u>GALLONS</u>	THERMS	PER <u>GALLON</u>	PER <u>THERM</u>
GAS FROM INVENTORY	GALLONS	0.91502	1,109,023	1,014,778	\$0.8369	\$0.9146
GAS FROM CNG	THERMS	N/A	N/A		N/A	