



Michael J. Sheehan, Esq.
Senior Counsel
603-724-2135
Michael.Sheehan@libertyutilities.com

November 25, 2020

Via Electronic Mail Only

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

**Re: Docket No. DG 20-152; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a
Liberty Utilities
Keene Division Winter 2020-2021 Cost of Gas**

Dear Ms. Howland:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities, enclosed please find responses to the two record requests made during the November 20, 2020, hearing in the above matter, marked as Confidential Exhibit 23 and Exhibit 24, and a *Motion for Protective Order and Confidential Treatment as to Exhibit 23*. Since the Company seeks confidential treatment of Confidential Exhibit 23 in its entirety, only the table of contents will be publicly filed.

Exhibit 23 contains documents related to the company's evaluations of providing CNG to the Marketplace, which were conducted through the May 22, 2017, amendment to the CNG contract that governs the demand charges and incremental CNG costs at issue in this docket.

Exhibit 24 contains written communications to customers and other stakeholders in advance of the 2019 conversion of the Monadnock Marketplace. It also includes a September 2016 notice to Marketplace customers indicating the Company's intent to convert the Marketplace in 2017 and requesting information about customer equipment to facilitate planning for that conversion.

Note that, as discussed during the hearing, the conversion of the Marketplace was not an economically driven decision that weighed the cost of propane-air against CNG, but was undertaken to resolve safety and reliability issues with the propane-air blower system after consideration of many other alternatives. These safety and reliability concerns first arose from the December 2015 incident and continued into the fall of 2016, as evidenced by Bates * of Exhibit 23, which shows the Company was still experiencing issues with the modifications to the

blower system and thus first tried to install a temporary CNG facility in late 2016. The documents provided in Exhibit 23 demonstrate the Company's evaluations and efforts to obtain the best pricing and related terms for CNG and confirm the prudence of the CNG contract at issue.

Note also that Staff has previously been provided information regarding the conversion of the Marketplace, through the data responses at Bates 080, through the review of Staff's consultant, Liberty Consulting Group, in EnergyNorth's prior rate case, Docket No. DG 17-048, and through conversations and meetings referenced in these documents.

Pursuant to the Commission's March 17, 2020, secretarial letter, only an electronic version of this filing will be provided.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Sheehan", written in a cursive style.

Michael J. Sheehan

Enclosures

Cc: Service List