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

DG 21-008
Petition for Approval of a Firm Transportation Agreement with
Tennessee Gas Pipeline Company, LLC

Conservation Law Foundation Data Requests - Set 2

Date Request Received: 5/7/21	Date of Response: 5/20/21
Request No. CLF 2-1	Respondent: William R. Killeen

REQUEST:

Please provide any workpapers, analyses, and workbooks with formulas intact demonstrating how the 2018-2020 NH Saves Triennial Plan and any other energy efficiency savings assumptions are reflected in "Figure 1: Updated Base Case Design Day Demand Forecast" in the DaFonte and Killeen testimony (Bates p. 15).

RESPONSE:

Please see Attachment CLF 2-1.xlsx for the calculation of the monthly estimate of energy efficiency over the forecast period. As noted on Bates 029 through 030 of the Company's Least Cost Integrated Resource Plan (Docket No. DG 17-152), after adjusting for energy efficiency, the forecast is then adjusted for unaccounted for gas, unbilled sales, and translated from a monthly to daily basis. The resulting energy efficiency savings on the Design Day, after translating the forecast in Attachment CLF 2-1.xlsx to a daily basis, are provided in the response to Staff TS 1-1.

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Date Request Received: 5/7/21	Date of Response: 5/20/21
Request No. CLF 2-2	Respondent: Michael Sheehan

REQUEST:

Please provide unredacted versions of the DaFonte and Killeen testimony and DaFonte and Killeen attachments that were filed with the Commission on January 20, 2021.

RESPONSE:

The requested documents have been previously provided to CLF, subject to the NDA between Liberty and CLF.

REDACTED

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Date Request Received: 5/7/21 | Date of Response: 5/20/21
Request No. CLF 2-3 | Respondent: William R. Killeen

REQUEST:

Please provide the rates for all of Liberty's contracts with Tennessee Gas Pipeline that are listed in Liberty's response to data request CLF 1-21 (Contract Nos.: 523; 8587; 2302; 632; 11234; 72694; 95346; and 42076).

RESPONSE:

The demand (or reservation) charges and variable (or commodity) charges for the various contracts on TGP are shown below.

RESERVATION CHARGES				MONTHLY
				DEMAND
				RATE
CONTRACT #		MDQs		($/Dth/month)
Ctr #8587		25,407		17.08207109
Ctr #632		15,265		7.1645
Ctr #11234		9,039		6.9764048
Ctr #2302		3,122		6.2957
Ctr #95346		4,000		6.2957
Ctr #72694		30,000		[redacted]
Ctr #42076		20,000		4.1818
Ctr#523		21,844		1.3094
		1,560,391		0.0179
COMMODITY CHARGES				TOTAL
				COMMODITY
				RATE
CONTRACT #				($/Dth)
Ctr #8587	Z0-Z6	7,035		0.2939
	Z1-Z6	14,561		0.2563
	Z4-Z6	3,811		0.1002
Ctr #632	Z4-Z6	15,265		0.1002
Ctr #11234	Z4-Z6	7,082		0.1002
	Z5-Z6	1,957		0.076
Ctr #2302	Z5-Z6	3,122		0.076
Ctr #95346	Z5-Z6	4,000		0.076
Ctr #72694	Z6-Z6	30,000		0.032
Ctr #42076	Z6-Z6	20,000		0.032
Ctr#523	W/D	21,844		0.0087

The figure marked above is a negotiated rate and is thus confidential third-party pricing, which information is protected from disclosure by RSA 91-A:5, IV, as “confidential, commercial, or financial information” of a third party. Therefore, pursuant to RSA 91-A:5, IV and Puc 203.08(d), the Company has a good faith basis to seek confidential treatment of the above information and will submit a motion seeking confidential treatment prior to the final hearing in this docket.

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Date Request Received: 5/7/21 | Date of Response: 5/20/21
Request No. CLF 2-4 | Respondent: Francisco C. DaFonte

REQUEST:

Has the Company performed analysis to consider whether increased used of LNG would reduce the need for the additional capacity that the proposed TGP capacity contract would provide? If so, please provide all materials related to these analyses.

RESPONSE:

No. The Company has a finite amount of LNG storage on its distribution system and that storage capacity is already included in the Company's available design day resources.

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Date Request Received: 5/7/21	Date of Response: 5/20/21
Request No. CLF 2-5	Respondent: William R. Killeen

REQUEST:

What impact would removing the Windham out of model adjustment from the demand forecast model have on the Company's demand forecasts? Would removing the Windham extension from the demand model help to alleviate some of the distribution issues foreseen if the on-system enhancements are not undertaken?

RESPONSE:

Please see the responses to PLAN 1-8 and Staff TS 1-3. As shown in the Company's response to Staff TS 1-3, even if the demand forecast was adjusted to remove the Windham out of model adjustment and reduce the volumes associated with iNATGAS, the Company would still have a Design Day resource shortfall.

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Conservation Law Foundation Data Requests - Set 2

Date Request Received: 5/7/21	Date of Response: 5/20/21
Request No. CLF 2-6	Respondent: Francisco C. DaFonte

REQUEST:

Please confirm that the Company does not intend to seek pre-approval from the Commission for the proposed on-system enhancements discussed in the DaFonte and Killeen testimony and that the Company, instead, intends to seek recovery from the Commission for the costs associated with the on-system enhancements following their completion? Conversely, in the Granite Bridge docket (DG 17-198), the Company sought pre-approval for the costs of the Granite Bridge project. At what scale/level of on-system enhancements or other construction costs does the Company consider sufficient scale to seek pre-approval from the Commission for planning and construction costs? Why does the Company consider $45 million in on-system enhancements an insufficient scale/level for the Company to seek pre-approval from the Commission?

RESPONSE:

The Company does not intend to seek pre-approval from the Commission for the referenced on-system enhancements. The Company considers the on-system enhancements discussed in the DaFonte and Killeen testimony to be similar in nature to other distribution system improvements that are made each year to provide increased reliability and resiliency. These types of projects are not subject to pre-approval, but are submitted to the Commission for cost recovery after they are in-service, such as in future rate case proceedings.

The proposed Granite Bridge project was an upstream capacity and supply project that was the least-cost option at the time to meet the Company's future demand needs when compared to other capacity and supply alternatives such as those from TGP and Repsol. As with any long-term capacity and supply resource decision, the Company conducts a thorough comparative analysis of all available resource options to determine the least-cost alternative. Once the Company has determined the least-cost alternative it then makes a filing with the Commission for pre-approval of the selected resource. As with the proposed Granite Bridge project, these long-term resource decisions are considered incremental to the Company's existing portfolio. In addition, these capacity and supply resource costs are also collected through the Cost of Gas as compared to distribution system enhancements, which are recovered through base distribution rates.

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Date Request Received: 5/7/21 | Date of Response: 5/20/21
Request No. CLF 2-7 | Respondent: William R. Killeen

REQUEST:

At the May 3, 2021 technical session, the Company's witnesses testified that the design day is meant to be rare and that this explains the fact that actual peak day demand has historically been less than design day demand. Does the company have, or have access to, historic meteorological data from the past (a) 30 years; (b) 100 years; and/or (c) 120 years? If so, for which years, and for how many of those years, have the Company's design day conditions occurred?

RESPONSE:

The Company's historical data set includes daily weather data starting in 1977 through the present. Since 1977 there has been one day in which the actual HDDs were equal to or greater than 71.4 HDDs.

As explained in Appendix 4 of the Company's Least Cost Integrated Resource Plan (Docket No. DG 17-152), the Company developed the estimate of Design Day HDDs based on daily temperatures for the period 1977 through 2016. The historical data was used in a Monte Carlo analysis to develop 4,096 years of synthetic daily temperatures. That analysis resulted in a mean expected coldest day of 4.27 ºF (60.73 HDD) and a standard deviation of 5.33 ºF. As discussed on Bates 033 of the Company's Least Cost Integrated Resource Plan, the Design Day was assumed to be two standard deviations colder than the mean expected coldest day, or negative 6.39 ºF, which converts to 71.4 HDDs. That methodology is consistent with the methodology used by the Company and approved by the Commission in prior Least Cost Integrated Resource Plan filings.