

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

DG 21-130

Winter 2021/2022 Cost of Gas and Summer 2022 Cost of Gas

Department of Energy Data Requests - Set 2

Date Request Received: 6/21/22
Request No. DOE 2-6

Date of Response: 7/6/22
Respondent: Catherine McNamara

REQUEST:

Reference: Liberty’s Motion for Increase Summer 2022 COG Rates (May 20, 2022); Gilbertson Supp. Testimony” “McNamara Supp. Testimony; Liberty and DOE Joint Report on LDAC and COG proceedings (EnergyNorth) (filed December 27, 2021)

Liberty and DOE’s Joint Report (filed December 27, 2021 in this docket), create a proposed procedural schedule to minimize last minute updates and allow adequate time for DOE and the Commission to review Liberty’s COG filings, absent unexpected and unforeseeable substantial changes. Given the uncertainty of the current market, will Liberty file any updated proposals to exceed the maximum COG as approved in Order 26,541 on or before June 13, 2022? If not, please explain why not.

- a. At a minimum, will Liberty make any updated filing on or before July 1, 2022? DOE notes that a July 1, 2022 update would potentially provide notice to the Commission and potentially to the public (through the docket) 30 days before a likely effective date of August 1, 2022. See RSA 378: 3. It would give the DOE and the Commission 6 business days before the hearing date to review any new material. Unfortunately, pursuant to the Commission’s hearing guidelines filed May 26, 2022, because all exhibits must be filed 5 days before the scheduled hearing date - i.e., on or before July 6, 2022 - a July 1 update would only give the DOE 1 business day to review any updated Liberty COG filing before DOE would be required to identify all DOE Exhibits.
- b. Will Liberty make the May 20, 2022 filing, and any subsequent updates, exhibits for the July 13, 2022 hearing, as contemplated in the parties *Joint Report on LDAC and COG proceedings*? If not, why not?
- c. If Liberty were to make an updated filing on or after June 13, 2022, please explain why an updated filing could not have been made on or about June 13, 2022, consistent with the Joint Report (filed December 27, 2022), and NYMEX forecasting available on that date. Please identify NYMEX forecasting as of June 13, 2022, and one-week after the LNG fire in Texas described in DOE Attachment 2-4.01 (WSJ article).

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RESPONSE:

- a. No, Liberty will not make an updated filing on or before July 1, 2022. Since the Company did not file for an updated rate, the resulting under-collection will be \$2,676,848.
- b. Yes, Liberty will make the May 20, 2022, filing an exhibit for the July 13, 2022, hearing.
- c. The Joint Report and any recommendations or schedules referenced by DOE Staff throughout this data request apply to Liberty's annual cost of gas filings, beginning with Liberty's Winter 2022–2023 and Summer 2023 filing, and is not relevant to the cost of gas filing which is the subject of this docket.

Liberty has not made any updates to the May 20, 2022, filing, and does not have the NYMEX values as of June 13, 2022, or one week after the LNG fire in Texas described in DOE Attachment 2-4.01 (WSJ article).