

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

DG 22-015

Summer 2022 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 3/23/22
Request No. DOE 1-12

Date of Response: 3/29/22
Respondent: Catherine McNamara
Steve Rokes

REQUEST:

Ref: PHMSA 7100 Report Part G for 2019-2021 and Testimony at Bates 011-13

Please provide the Summer 2022 amount and percentage of unaccounted for gas by fuel type, i.e., separately for CNG and for propane, and show computations that resulted in an overall percentage for the entire system of 0.19%.

The PHMSA 7100 Reports seem to indicate the following; please confirm.

System	Year	Unaccounted Gas
Natural Gas (CNG)	2019	0%
	2020	2.24%
	2021	2.29%
Propane Air	2019	0.90%
	2020	2.51%
	2021	1.49%
Summer 2022 COG		0.19%

How did Liberty improve the unaccounted for gas percentages for Propane from 1.49% to 0.19%? How did Liberty improve the unaccounted for gas percentages for CNG from 2.29% to 0.19%? Please explain. Please provide a live Excel spreadsheet to show the Summer 2022 rate of 0.19%. and the individual CNG and Propane percentage calculations.

RESPONSE:

The calculation used in tab “G - Actual Sendout” of 0.19% comes from the Liberty-Keene Winter 2021/2022 Cost of Gas filing. See Confidential Attachment DOE 1-13.xlsb for the calculation

The CNG rate above for 2020 did not include adjustments to match the billing cycles with the produced gas periods, as described below.

The CNG rate for 2021 above is incorrect. A revised report was filed on March 14, 2022, which indicates this amount was reduced to 1.59%. The change was due to a non-registering meter on the system with usage being estimated using prior history. See Attachment DOE 1-12.xls for the customer billing cycles which were adjusted to match the sendout gas periods.

The Propane Air rate for 2019 and 2020 did not include adjustments of the billing cycles to match with the sendout gas periods, as described below.

The Propane Air rate for 2021 includes customer billing cycles adjustments to match the sendout gas periods. See Attachment DOE 1-12.xls for the customer billing cycles which were adjusted to match the sendout gas periods. The discrepancies are due to Liberty using two different sets of data for calculating the percentages -- the numbers used in the lost and unaccounted for (LAUF) gas calculation are the sendout gas, excluding company usage, as compared to customer usage.

Sendout gas and company use gas data is gathered based on the calendar month, i.e., from the first of the month to the first of the next month. However, the customer usage data is derived from the billing cycle which is not based on a calendar month. Keene’s billing cycles are now typically from the 23rd of one month to approximately that date of the following month. These billing dates can vary slightly from month to month.

Prior to the 2021 period for the LAUF calculations, Keene used the customer usage data (based on the actual billing cycles beginning and ending around the 23rd of each month), which did not match the same period as the sendout gas and company usage data (the first of the month to the first of the next month). This method was used by Keene many years prior, however, in the past, Keene’s billing cycles more closely matched the sendout gas cycles. Billing cycles would run from the first five to seven days of the month to the next month. It was only in the past couple of years that the billing cycles were changed to the current dates mentioned above, giving rise to a mismatch of data.

Beginning with the 2021 PHMSA 7100 Report, the customer usage was adjusted to a period of a calendar month, so that the billing cycle would more closely match the cycle of the sendout gas and company usage. This allows for a more accurate representation of the LAUF. However, when the calculations are performed using adjusted or actual billing cycle data the results can vary, as can be seen from our reported results.

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Again the 2021 PHMSA reports for Propane and CNG used adjusted billing cycle data for its' calculations and the Summer 2022 COG used the data from the actual billing cycles (unadjusted).

Although the unadjusted data provides a much lower LAUF percentage, the PHMSA LAUF is believed to be the more accurate and realistic calculation.