

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 1-13

Date of Response: 3/29/22
Respondent: Catherine McNamara
Deborah Gilbertson

REQUEST:

Ref: March 15, 2022 Filing, Schedule B

Please identify and include in a revised Schedule B the CNG commodity cost, CNG marketer basis charge, the service adder, and demand charges per therm for CNG. Please identify all components above line 9 for “CNG costs per therm actual,” and update line 9 accordingly. (When demand charges are above line 9, line 11 would be omitted as redundant)

- a) Does Liberty-Keene agree that the commodity costs, marketer basis charge, service adder, and demand charges should be included in the cost of CNG per therm? Why or why not?
- b) Please update Schedule B to include all CNG supplier charges in the projected per therm cost for CNG.
- c) Please update Schedule A to include all CNG supplier charges in the projected per therm cost for CNG.

RESPONSE:

- a) Please refer to the Company’s response to DOE 1-4 (a). Demand Charges are fixed charges and are not charged by the unit, therefore they should not be included in the per therm cost on Schedule B, line 9.
- b) Please see Confidential Attachment 1-13.xlsb, tab “B,” for a revised Schedule B calculation where the CNG unit costs include CNG commodity cost, CNG marketer basis charge, the service adder, and demand charges. Please note this does not change the requested COG rate.
- c) Schedule A includes all CNG supplier charges and the fixed demand charge, which together computes to the unit cost of the projected CNG volumes in this period. For a

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detailed breakdown of the CNG cost please refer to Confidential Attachment 1-13.xlsb, tab “K – WACOG,” lines 21 through 29.

Confidential Attachment DOE 1-13.xlsb contains pricing and other information that is “confidential, commercial, or financial information” that is 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. And since Confidential Attachment DOE 1-13.xlsb is a live Excel file, the confidential material cannot be redacted and still preserve the functionality of the model, only a confidential version will be provided