

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 2

Date Request Received: 4/8/22
Request No. DOE 2-11

Date of Response: 4/18/22
Respondent: Catherine McNamara

REQUEST:

Ref: Liberty’s Response to DR 1-19

Will Liberty agree to file Stipulations in this docket as follows:

- a) “Nothing that is adjudicated in the Liberty-Keene Summer 2022 COG docket will resolve or alter any issue that was ‘carved out’ of Dockets No. DG 21-130 and No. 21-132. Specifically, issues that have been carved out of the Dkts. No. 130, 132 and now this Docket No. 22-015, include but are not limited to the appropriate RDAF rate and its timing and implementation, whether Tariff page 101 remains noncompliant, and whether what Liberty describes as a \$4 million RDAF error is subject to recoupment, through the COG or otherwise.”
- b) “None of the amount Liberty described as the \$4 million RDAF error in Dkt. No. DG 21-130 has been recovered to date.”
- c) None of the amount Liberty described as the \$4 million RSAF error in Dkt. No. DG 21-130 will be recovered in (or through) the Liberty-Keene Summer 2022 COG.

If not, why not? Please be specific. If no, please propose alternate wording for each stipulation Liberty would sign, consistent with Liberty’s response to DR 1-19.

RESPONSE:

- a) Liberty will stipulate that an order in this docket approving the proposed Keene Summer Cost of Gas rates would not resolve or alter issues related to the Company’s under-collection of approximately \$4 million that arose from the application of the decoupling tariff over the first two decoupling years, November 1, 2018, through October 31, 2020 (the “RDAF issue”). Note that the recently issued Order No. 26,611 (Apr. 15, 2022) resolved some of the issues referenced in this question.
- b) Liberty will stipulate that it has not recovered any of the approximately \$4 million related to the RDAF issue.

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- c) Liberty will stipulate that the proposed Keene Summer cost of gas rate does not include recovery of any of the \$4 million related to the RDAF issue.