

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

DG 22-057

Winter 2022/2023 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/23/22  
Request No. DOE 1-4

Date of Response: 9/29/22  
Respondent: Heather Tebbetts

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**REQUEST:**

Reference: Liberty-Keene COG (filed Sept 15, 2022), Testimony of Gilbertson and Tebbetts (FPO program), Schedule M

- a. Please provide a copy of the FPO Offer letter the Company will mail to Liberty-Keene customers; please confirm the mail date, the ending date, and the number of customers the Company expects to participate.
- b. Please explain why Schedule M Line 18 and 19 shows “n/a” under the “Premium Revenue” column, while Line 4 shows a negative number, i.e., “- 1,071.” Please provide the “premium revenue for Lines 18 and 19, even if negative. If figures are not available, please explain why.

**RESPONSE:**

- a. Please see Attachment DOE 1-4 for the FPO letter that was sent on September 23, 2022. Customers have until October 26, 2022, to respond. The Company does not have an expectation of the number of customers participating in the FPO program. Based on enrollments as of September 27, 2022, for letters mailed out on September 20, 2022, the Company is likely to see higher enrollments than last year but cannot speculate on the anticipated number of enrollments.
- b. The premium rate for 2003 through 2005 was \$0.01. See the table below for the figures:

Year (a)	Premium Rate (b)	Volumes (c)	Total Premium Revenue (b) x (c)
2003 – 2004	\$0.01	340,315	\$3,403
2004 – 2005	\$0.01	316,300	\$3,163

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Date Request Received: 9/23/22  
Request No. DOE 1-5

Date of Response: 9/29/22  
Respondent: Heather Tebbetts

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**REQUEST:**

Reference: Liberty COG (filed Sept 15, 2022) Testimony of Gilbertson and Tebbetts (unaccounted for gas); Liberty Response to DOE TS 1-4 in Dkt. No DG 21-132; See RSA 12-P 15 (formula for unaccounted for gas volume is total gas purchase, minus quantity delivered to customers + gas used by Liberty-K).

The Company states that “[t]he Company actively monitors its level of unaccounted for volumes, which amounted to 2.11% for the twelve months ending June 30, 2022.”

In DG 21-132, Liberty Response to DOE TS 1-4, Liberty-Keene reported a “level of unaccounted for gas volumes” of 0.19% as a blended rate for both the propane and CNG systems.

- a. Please provide the unaccounted-for gas volumes for the CNG system for the twelve-month period ending June 30, 2022.
- b. Please provide the unaccounted-for gas volumes for the air-propane system for the twelve-month period ending June 30, 2022.
- c. Please explain the increase from 0.19% to 2.11% for lost and unaccounted for gas [LAUF] comparing the 2020-21 and 2021-22 periods.

**RESPONSE:**

The Company is in the process of gathering the requested information and will file an updated response as soon the information is available.

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Department of Energy Data Requests - Set 1

Date Request Received: 9/23/22  
Request No. DOE 1-6

Date of Response: 9/29/22  
Respondent: Heather Tebbetts

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**REQUEST:**

Reference: Liberty COG (filed Sept 15, 2022) Testimony of Gilbertson and Tebbetts

- a. What is the status of the Company’s CNG/LNG expansion plans for this franchise area? Please include, but do not be limited to Liberty-Keene’s current plans with regard to finding a location for a permanent physical facility, Company expansion with regard to the high pressure main under Route 9 and the status with regard to further expansion (CNG and/or propane or propane/air facility).
- b. Please provide an update from DR responses in Dkt No. 21-130 which noted that Liberty was in “negotiation with a large commercial customer in Keene to utilize RNG from the Bethlehem RNG project (known as LOI Customer #3 in Docket No. DG 21-036). Please include a discussion of any use Liberty or Liberty affiliates may be making of RNG, including but not limited to RNG from the Bethlehem RNG project.

**RESPONSE:**

- a. The Company will file its 2022 LCIRP on October 3, 2022. The following paragraphs from the LCIRP are responsive to this question:

The Company’s propane-air system is nearing the end of its useful service life and will require major upgrades and/or replacement of major infrastructure to continue servicing the City of Keene. Liberty proposes to replace the major infrastructure with a new, safer, more reliable, and economic solution that will benefit its utility, the plant staff, and most importantly, the City of Keene – hereinafter referred to as the Green Keene project.

The objective of this proposed Green Keene project is to transition the Keene Division’s aging propane-air facility and distribution network to a safe, reliable, clean, economic fuel and gas system for Keene customers. Liberty has identified that the best path forward for this transition would be to develop a supply and implementation strategy for conversion to CNG and LNG. This solution has been chosen partly due to the presence

of the already converted “Marketplace” but has also been determined by consultants, GHD, as the most economical way of delivering a safer, cleaner, and more reliable fuel based on an alternate fuel supply assessment that has been evaluated. It is also Liberty’s intention to investigate the development and deployment of renewable energy solutions at the CNG/LNG site using RNG and hydrogen as these fuels become more economically viable and easier to procure.

To date, Liberty has engaged consultants, have evaluated and selected a future supply option for the Keene Division, and developed an Opinion of Probable Construction costs for a CNG/LNG facility. Liberty is also identifying required distribution infrastructure upgrades and is beginning to investigate the effects on end user equipment, along with evaluating the future deployment of hydrogen-ready equipment and establishing a regulatory framework. The conversion to CNG/LNG is consistent with the Liberty and Algonquin transition to clean energy.

2022 LCIRP at 49.

- b. On August 19, 2022, the Company requested to suspend DG 21-036 to allow the RFP process required by RSA 362-I:2, III to run its course. The DOE joined in the Company’s request to stay the docket, though they did not agree to the schedule filed by Liberty on August 15, 2022. On August 31, 2022, the Commission closed DG 21-036 since the contract of which Liberty was seeking approval does not conform to the RFP process now required by RSA chapter 362-I. Liberty understands that LOI Customer #3 from Docket No. DG 21-036 is still very interested in RNG supply. Liberty considers the contract for RNG from the Bethlehem Project void. The Company plans to issue an RFP for RNG supply and will evaluate all responses. Once responses are received, Liberty will gauge the interest of LOI Customer #3 in any of the RNG proposals. No Liberty regulated LDC has RNG connected to their distribution system at this time but have projects in development and under construction.

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Department of Energy Data Requests - Set 1

Date Request Received: 9/23/22  
Request No. DOE 1-7

Date of Response: 9/29/22  
Respondent: Heather Tebbetts

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**REQUEST:**

Reference: Liberty COG (filed Sept 15, 2022) Testimony of Gilbertson and Tebbetts Bates 10 (under-collection), Schedule H

Please explain the prior period under-collection of \$223,755 in column “(1) *Beg. Of Month Balance*” on Schedule H and provide supporting documentation and any associated live Excel Spreadsheet(s).

**RESPONSE:**

The prior period under-collection is the beginning balance for November 1, 2021. Please see Confidential Attachment DOE 1-7.xlsx, tab “Rollforward 10-1920-1740,” column Z, for the backup support.

Confidential Attachment DOE 1-7.xlsx 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 and 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.

Note that the Company asserts confidentiality as to the entire document at this time. However, the Company will file in the near future a supplemental response with more targeted assertions of confidentiality and include a redaction version at that time.

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Department of Energy Data Requests - Set 1

Date Request Received: 9/23/22  
Request No. DOE 1-8

Date of Response: 9/29/22  
Respondent: Heather Tebbetts

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**REQUEST:**

Reference: Liberty COG (filed Sept 2 2022) Testimony of Gilbertson and Tebbetts, Bates 10, Schedule H

- a. Please explain the adjustments made on Schedule H in column “(2) (Over) Under Collection” and in column “(3) Adjustments.” Please provide any supporting documentation and live Excel Spreadsheet(s).
- b. In tab “GL Roll forward 1740 2021” please explain the adjustments made and the data source(s) thereof, that lead to the corresponding figures in Schedule H “column (3) Adjustments” for the months of May, June, and July.

**RESPONSE:**

- a. There are adjustments made during the summer months to the winter COG as needed. The adjustments in this filing include the monthly CNG demand deferral, spread over twelve months; May gas supply collections as customer bills are rendered on a billing month, not a calendar month. Adjustments are needed to adjust for those bills with usage in April rendered in May and other summer months that may have cancel/rebills occurring; the unbilled reversal for May, interest, and winter COG low-income collections for bills rendered in May for April usage and cancel/rebills.
- b. The adjustments are the adjustments explained in part a. Tab “GL Rollforward 1740-2021” is the source of the adjustments in the filing. The data in this tab comes directly from the GL.