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

DG 23-067

Distribution Service Rate Case

Department of Energy Data Requests - Set 1

Date Request Received: 8/18/23 Request No. DOE 1-1 Date of Response: 8/28/23 Respondent: Todd Schavrien

<u>REQUEST</u>:

Please provide live Excel versions of all spreadsheets associated with the Testimony and Attachments filed in the docket on July 27, 2023, in the above-captioned matter.

RESPONSE:

Please see <u>Attachment 23-067 DOE 1-1.1.zip</u>, which contains live Excel versions of all spreadsheets associated with the following Testimony and Attachments filed in Docket No. DG 23-067.

Testimony	Attachment(s)
Tyler J Culbertson & C. Drew Cayton	Attachment DOE 1-1.1
(Temporary & Permanent)	Attachment DOE 1-1.2
Tracey A. Musto & Bradford R. Marx	Attachment DOE 1-1.3
	Attachment DOE 1-1.4
	Attachment DOE 1-1.5
	Attachment DOE 1-1.6
	Attachment DOE 1-1.7
	Attachment DOE 1-1.8
	Attachment DOE 1-1.9
Lauren A. Preston	Attachment DOE 1-1.10
Tyler J. Culbertson	Attachment DOE 1-1.11
Albert W. Bremser	Attachment DOE 1-1.12
C. Drew Cayton	Attachment DOE 1-1.13
Kenneth A. Sosnick	Attachment DOE 1-1.14
	Attachment DOE 1-1.15
Ann E. Bulkley & Christopher M. Wall	Attachment DOE 1-1.16
	Attachment DOE 1-1.17
	Attachment DOE 1-1.18
	Attachment DOE 1-1.19
	Attachment DOE 1-1.20
	Attachment DOE 1-1.21

Please see <u>Confidential Attachment 23-067 DOE 1-1.2.zip</u>, which contains a live Excel version of the spreadsheets associated with the following Testimony and Attachments filed in docket DG 23-067.

Testimony	Attachment(s)
Ann E. Bulkley & Christopher M. Wall	Attachment DOE 1-1.22-CONFIDENTIAL

<u>Attachment DOE 1-1.22-CONFIDENTIAL</u> contains a collection of rate case results across the country that was compiled by a third party through a subscription service that Liberty's consultant has with that provider, S&P. A condition of the subscription is that S&P's customer, Liberty's consultant, must keep the information confidential to preserve the value of S&P's product. The information is thus proprietary information of S&P, which has taken steps to preserve its confidentiality. S&P's competitive position would be harmed if other firms had unrestricted access to this information. Therefore, pursuant to Puc 203.08(d), the Company has a good faith basis to seek confidential treatment of this information and will submit a motion seeking confidential treatment prior to the final hearing in this docket.