

REDACTED

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

DG 23-076

Winter 2023/2024 Cost of Gas and Summer 2024 Cost of Gas

Department of Energy Data Requests - Set 2 (COG)

Date Request Received: 9/22/23  
Request No: DOE 2-1 (COG)

Date of Response: 10/3/23  
Respondent: James King

---

**REQUEST:**

Reference: i) Liberty-EnergyNorth's Winter 2022-2023 COG Reconciliation submitted on July 31, 2023 via email from Maureen Karpf; ii) Liberty-EnergyNorth's original Updated Winter 2022-23 and Summer 2023 COG Model submitted on October 7, 2022 via email from Maureen Karpf.

In both Ref. i) and ii), the Tab "Pk Schedule 10-B-JL" seems to be identical indicating that planned and actual firm (therm) sales were identical.

- a. Please confirm there was no error in the Reconciliation filing (i.e., the planned Winter 2022-2023 and Summer 2023 firm therm sales were exactly identical to Winter 2022-2023 reconciled firm therm sales)
- b. If there was error in the Reconciliation filing, please provide actual firm therm sales for the Winter and Summer periods, on a month-by-month basis, with corrections
- c. If there was error in the Reconciliation filing, please identify appropriate (over)/under-collection for COG commensurate to correctly reconciled firm therm sales on a month-by-month basis for both Winter 2022-23 and Summer 2023 period. Please provide a detailed narrative description of corrections Liberty makes, if any and supporting documentation, including live Excel Spreadsheets.
- d. If Liberty's Reconciliation filing (submitted on July 31, 2023 was updated thereafter, please provide answers for the updated/revised Reconciliation as well.

**RESPONSE:**

- a. There was no error in the Reconciliation filing. The Reconciliation filing consists of 6 summary pages and Schedules 1 through 9. The excel model provided includes several source tabs that act as inputs for the summary pages and submitted schedules. The referenced tab "Pk Schedule 10-B-JL 22-23 filing" represents the forecast for the peak 2022-2023 Winter cost of gas filing, which was submitted in DG 22-045. Information from this tab is used on the "Summary 6 FTCG" tab solely to compare what was filed in DG 22-045 to the actuals from the reconciliation.

REDACTED

- b. There was no error in the Company's reconciliation. The actual therms billed can be seen on Schedule 3 of the reconciliation filing. The Company submitted an updated reconciliation filing on September 1, the same day as the Company submitted the cost of gas filing in this docket. The only change made to Schedule 3 from the originally filed reconciliation filing is a correction for the split of the G-50's therm sales between firm sales volumes and transportation volumes, this correction did not affect total volumes.
- c. N/A
- d. N/A

REDACTED

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

DG 23-076

Winter 2023/2024 Cost of Gas and Summer 2024 Cost of Gas

Department of Energy Data Requests - Set 2 (COG)

Date Request Received: 9/22/23  
Request No: DOE 2-2 (COG)

Date of Response: 10/3/23  
Respondent: James King

---

**REQUEST:**

Reference. Liberty's response to DOE DR 2-1

If there was an error in Liberty's EnergyNorth Reconciliation filing, please recalculate the bill impacts, using the LDAC currently in effect pursuant to NiSi Order No. 26,873 (August 14, 2023) (Modifying Orders Nos. 26,715 and 26,737 Extending Local Distribution Adjustment Charge Rates until January 31, 2024)

**RESPONSE:**

See response to DOE 2-1. There were no errors in regard to the Company's reconciliation filing. Bill impacts provided in response to DOE 1-3 provide impacts with the currently effective LDAC rates.

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

DG 23-076

Winter 2023/2024 Cost of Gas and Summer 2024 Cost of Gas

Department of Energy Data Requests - Set 2 (COG)

Date Request Received: 9/22/23  
Request No: DOE 2-3 (COG)

Date of Response: 10/3/23  
Respondent: Deborah Gilbertson

---

**REQUEST:**

Reference. Liberty's Response to DOE DR 1-4

Liberty did not provide information on the customer count associated with past Winter 2022-2023 and current Winter 2023-2024 firm (therm) sales. Please respond to DOE DR 1-4 in full.

**RESPONSE:**

It is Liberty's understanding that DOE 1-4 requested data underlying the Company's demand forecast used in the 2023-2024 Cost of Gas filing.

DOE 1-4: Please provide data, any associated models, and a narrative description of how the Company forecasts its sales (in therms) and how the Company forecasts the associated number of customers. Please identify any changes Liberty has made in assumptions, formulas or calculation as compared the Company forecast Liberty made in Docket No. DG 22-045.

As discussed in response to DOE 1-4, there have been no changes to the methodology or assumptions relative to the demand forecast relied on in the 2022-2023 Cost of Gas filing. In addition, the demand forecast relied upon in this 2023-2024 Cost of Gas filing is consistent with the demand forecast prepared in Liberty's most recent Least Cost Integrated Resource Plan ("LCIRP"), which is described in detail in Appendix 1 of the LCIRP.

The requested customer count (i.e., equivalent bills) data for Winter 2022-2023 is provided in Attachment 23-076 DOE 2-6 (COG).xlsx.

The Winter 2023-2024 forecast as summarized in Schedule 10 B can be calculated by summing the monthly forecast values in the "Volumes\_PostEE" tab of Attachment 23-076 DOE 1-4.1.xlsx for the period November 2023 through April 2024 (i.e., 135,983,231 therms) and adding the forecast of iNATGAS in the "Calibrated Results" tab of Attachment 23-076 DOE 1-4.2.xlsx for the same period (i.e., 1,809,695 therms). That calculation results in a Winter 2023-2024 demand of 137,792,926 therms, which is consistent with the Total All Sales forecast (Line 36) in the Subtotal PK 23-24 column of Schedule 10 B.

REDACTED

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

DG 23-076

Winter 2023/2024 Cost of Gas and Summer 2024 Cost of Gas

Department of Energy Data Requests - Set 2 (COG)

Date Request Received: 9/22/23  
Request No: DOE 2-4 (COG)

Date of Response: 10/3/23  
Respondent: Deborah Gilbertson

---

**REQUEST:**

Please provide customer counts **by rate classes** as described below:

- a. Actual customer counts separately by month for the period November 2018 to August 2023; and any forecasted figure on a month-by-month basis for September 2023 and October 2023
- b. Average of: actual customer counts for Winter 2018-2019, Winter 2019-2020, Winter 2020-2021, Winter 2021-2022, Winter 2022-2023, and forecasted Winter 2023-2024
- c. Average of: actual customer counts for Summer 2019, Summer 2020, Summer 2021, Summer 2022, Summer 2023, and forecasted Summer 2024
- d. Please submit data for a) to c) in Live Excel format

**RESPONSE:**

- a. The customer count data presented in Liberty's Cost of Gas filing is equivalent bill count. Because Liberty relies solely on equivalent bills and not a separate definition of actual customer count in its Cost of Gas filings, actual customer count data is not relevant to the Cost of Gas filing and is not readily accessible due to the complexity of what defines an 'actual customer.'
- b. See response a.
- c. See response a.
- d. See response a.

REDACTED

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

DG 23-076

Winter 2023/2024 Cost of Gas and Summer 2024 Cost of Gas

Department of Energy Data Requests - Set 2 (COG)

Date Request Received: 9/22/23  
Request No: DOE 2-5 (COG)

Date of Response: 10/3/23  
Respondent: Deborah Gilbertson

---

**REQUEST:**

Reference. Liberty response to DOE DR 2-4

Please calculate the customer growth rate **by rate classes** for your response to DOE DR 2-4 and provide the data in live Excel format.

**RESPONSE:**

Please see the response DOE 2-4.a.

REDACTED

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

DG 23-076

Winter 2023/2024 Cost of Gas and Summer 2024 Cost of Gas

Department of Energy Data Requests - Set 2 (COG)

Date Request Received: 9/22/23

Request No: DOE 2-6 (COG)

Date of Response: 10/3/23

Respondent: Deborah Gilbertson  
James Bonner

---

**REQUEST:**

Please provide Equivalent Bill (EB) counts **by rate classes** over:

- a. Actual EB counts separately by month for the period November 2018 to August 2023; and any forecasted EB figure on a month-by-month basis for September 2023 and October 2023
- b. Average of: actual EB counts for Winter 2018-2019, Winter 2019-2020, Winter 2020-2021, Winter 2021-2022, Winter 2022-2023, and forecasted Winter 2023-2024
- c. Average of: actual EB counts for Summer 2019, Summer 2020, Summer 2021, Summer 2022, Summer 2023, and forecasted Summer 2024
- d. Please submit data for a) to c) in Live Excel format

**RESPONSE:**

- a. Please see Attachment 23-076 DOE 2-6 (COG).xlsx, Tab A.
- b. Please see Attachment 23-076 DOE 2-6 (COG).xlsx, Tab B.
- c. Please see Attachment 23-076 DOE 2-6 (COG).xlsx, Tab C.
- d. Please see Attachment 23-076 DOE 2-6 (COG).xlsx.

REDACTED

date	rn	rh	ch	cn	g41	g42	g43	g51	g52	g53	g54	r1	r3	r4	g41s	g42s	g43s	g51s	g52s	g53s	g54s	g41t	g42t	g43t	g51t	g52t	g53t	g54t	g41z	g42z	g43z	g51z	g52z	g53z	g54z	18		
11/1/2018	3,167	77,199	10,487	1,652	9,065	1,366	57	1,216	370	37	29	3,167	71,306	5,893	7,747	633	g43s	25	917	140	9	3	1,318	733	g43t	32	298	229	28	g54t	26	2	18	6	1	0	9	19
12/1/2018	3,274	80,177	10,938	1,712	9,461	1,416	60	1,262	382	38	30	3,274	74,029	6,148	8,105	662	27	955	145	9	4	1,356	754	33	307	237	29	26	2	19	6	1	0	9	19			
1/1/2019	3,277	80,383	10,971	1,711	9,493	1,418	60	1,263	382	37	29	3,277	74,229	6,153	8,146	664	28	953	147	7	4	1,347	754	32	309	235	30	25	2	19	6	1	0	9	19			
2/1/2019	2,954	72,754	9,939	1,545	8,602	1,282	54	1,139	345	34	27	2,954	67,206	5,548	7,396	617	24	862	135	7	4	1,206	665	30	277	210	27	23	2	17	6	1	0	8	17			
3/1/2019	3,274	80,649	11,007	1,709	9,528	1,420	60	1,260	384	35	30	3,274	74,534	6,115	8,183	688	26	953	150	8	4	1,345	732	34	307	233	27	26	2	19	6	1	0	9	19			
4/1/2019	3,166	77,896	10,593	1,652	9,172	1,364	57	1,216	373	34	28	3,166	72,072	5,824	7,869	650	24	915	147	8	3	1,303	714	33	301	226	26	25	2	18	6	1	0	9	18			
5/1/2019	3,276	80,228	10,771	1,703	9,308	1,404	59	1,249	389	36	29	3,276	74,322	5,905	7,976	665	26	939	156	8	3	1,332	739	33	310	233	28	26	2	19	6	1	0	9	19			
6/1/2019	3,169	77,427	10,242	1,649	8,832	1,352	57	1,209	377	35	28	3,169	71,794	5,632	7,551	642	25	911	153	8	3	1,281	710	32	298	224	27	25	2	18	6	1	0	9	18			
7/1/2019	3,260	79,800	10,465	1,721	8,990	1,417	59	1,266	393	34	28	3,260	74,136	5,665	7,679	684	27	959	159	9	3	1,311	732	32	307	234	26	26	2	19	6	1	0	9	19			
8/1/2019	3,269	79,686	10,417	1,735	8,930	1,432	56	1,277	398	33	27	3,269	74,157	5,528	7,630	696	26	972	161	8	2	1,300	735	30	306	237	25	25	2	19	6	1	0	9	19			
9/1/2019	3,165	77,301	10,097	1,672	8,656	1,384	56	1,229	384	33	26	3,165	72,032	5,269	7,397	672	26	933	155	7	2	1,259	712	30	296	229	26	24	2	18	6	1	0	9	18			
10/1/2019	3,270	80,450	10,687	1,735	9,189	1,440	59	1,274	400	34	27	3,270	74,816	5,635	7,883	707	26	968	166	7	2	1,305	733	33	306	234	27	25	2	19	6	1	0	9	19			
11/1/2019	3,172	78,634	10,666	1,686	9,201	1,407	58	1,235	392	33	26	3,172	72,750	5,885	7,975	714	25	944	166	7	2	1,226	693	33	291	226	26	24	2	18	6	1	0	9	18			
12/1/2019	3,285	81,680	11,138	1,743	9,619	1,455	64	1,273	407	34	28	3,285	75,796	5,883	8,449	781	27	1,002	182	6	1	1,170	674	36	271	225	28	27	2	19	6	1	0	9	19			
1/1/2020	3,290	81,859	11,189	1,743	9,667	1,459	63	1,271	410	34	29	3,290	76,001	5,858	8,526	793	28	1,002	189	6	1	1,140	665	35	268	221	28	28	2	18	6	1	0	9	20			
2/1/2020	3,084	76,733	10,489	1,631	9,062	1,367	59	1,189	385	32	26	3,084	71,267	5,465	7,969	730	26	931	174	6	1	1,092	637	33	258	210	26	25	2	16	6	1	0	9	17			
3/1/2020	3,305	82,077	11,213	1,746	9,686	1,464	63	1,272	411	34	29	3,305	76,325	5,752	8,513	782	28	993	186	6	1	1,173	681	35	279	226	28	28	2	18	6	1	0	9	20			
4/1/2020	3,193	79,416	10,789	1,688	9,313	1,415	61	1,229	397	34	28	3,193	73,988	5,427	8,173	760	27	958	179	6	1	1,140	655	34	271	218	28	27	2	17	6	1	0	9	19			
5/1/2020	3,299	82,034	11,025	1,744	9,504	1,458	63	1,269	410	35	29	3,299	76,481	5,553	8,323	784	28	988	185	6	1	1,181	674	35	281	226	29	28	2	18	6	1	0	9	20			
6/1/2020	3,205	79,600	10,503	1,682	9,034	1,409	60	1,222	398	34	28	3,205	73,975	5,325	7,871	753	25	947	181	6	1	1,164	656	35	275	217	28	27	2	17	6	1	0	9	19			
7/1/2020	3,328	81,890	10,790	1,734	9,275	1,451	64	1,260	410	35	29	3,328	76,481	5,410	8,057	766	28	972	187	6	1	1,218	685	36	288	223	29	28	2	18	6	1	0	9	20			
8/1/2020	3,341	81,894	10,762	1,730	9,247	1,451	64	1,257	409	35	29	3,341	76,614	5,280	8,032	764	28	972	186	6	1	1,215	687	36	285	223	29	28	2	18	6	1	0	9	20			
9/1/2020	3,239	79,335	10,452	1,677	8,981	1,408	62	1,219	395	35	28	3,239	74,426	4,909	7,808	741	27	943	178	6	1	1,173	668	35	276	217	29	27	2	17	6	1	0	9	19			
10/1/2020	3,342	82,273	10,950	1,734	9,425	1,461	65	1,261	408	36	29	3,342	77,070	5,203	8,205	767	28	977	183	6	1	1,220	693	36	283	225	30	28	2	18	6	1	0	9	20			
11/1/2020	3,232	79,917	10,819	1,680	9,336	1,420	63	1,221	396	35	28	3,232	74,632	5,285	8,181	743	29	950	179	6	3	1,155	677	34	271	217	29	25	2	17	6	1	0	9	19			
12/1/2020	3,339	82,842	11,281	1,738	9,746	1,470	65	1,261	411	36	29	3,339	77,346	5,496	8,595	773	30	990	190	6	3	1,151	697	35	271	221	30	26	2	18	6	1	0	9	20			
1/1/2021	3,346	83,026	11,314	1,739	9,777	1,472	65	1,262	412	36	29	3,346	77,516	5,510	8,632	776	30	1,004	192	6	3	1,145	696	35	261	220	30	26	2	18	6	1	0	9	20			
2/1/2021	3,020	75,095	10,248	1,575	8,858	1,331	59	1,144	373	33	26	3,020	70,123	4,972	7,822	702	27	908	173	6	3	1,036	629	32	235	200	27	23	2	16	6	1	0	8	17			
3/1/2021	3,336	83,168	11,356	1,743	9,817	1,475	65	1,266	413	36	29	3,336	77,658	5,510	8,673	775	30	1,005	192	6	3	1,144	700	35	261	221	30	26	2	18	6	1	0	9	20			
4/1/2021	3,229	80,422	10,932	1,687	9,443	1,425	63	1,224	400	35	28	3,229	75,100	5,321	8,353	750	29	971	186	6	3	1,090	675	34	253	214	29	25	2	17	6	1	0	9	19			
5/1/2021	3,328	82,931	11,134	1,742	9,599	1,470	65	1,264	413	36	29	3,328	77,460	5,471	8,480	774	30	1,004	192	6	3	1,120	696	35	260	221	30	26	2	18	6	1	0	9	20			
6/1/2021	3,210	80,117	10,634	1,683	9,151	1,421	63	1,222	398	35	28	3,210	74,834	5,284	8,068	748	29	971	184	6	3	1,083	673	34	251	213	29	25	2	17	6	1	0	9	19			
7/1/2021	3,314	82,660	10,909	1,740	9,362	1,464	64	1,266	409	35	29	3,314	77,239	5,430	8,267	771	29	1,013	190	6	3	1,114	693	35	253	219	29	26	2	18	6	1	0	9	20			
8/1/2021	3,305	82,591	10,878	1,740	9,350	1,464	64	1,267	410	35	29	3,305	77,216	5,375	8,241	772	29	1,024	192	6	3	1,109	692	35	243	218	29	26	2	18	6	1	0	9	20			
9/1/2021	3,399	79,934	10,518	1,683	9,040	1,416	61	1,224	397	34	28	3,399	74,558	5,376	7,969	746	27	981	187	6	3	1,072	671	34	244	210	28	25	2	17	6	1	0	9	19			
10/1/2021	3,305	82,770	11,019	1,739	9,484	1,470	65	1,266	409	35	29	3,305	76,786	5,984	8,378	778	30	1,008	191	6	3	1,107	692	35	258	218	29	26	2	18	6	1	0	9	20			
11/1/2021	3,192	80,466	10,892	1,682	9,401	1,428	63	1,224	396	34	28	3,192	74,285	5,181	8,314	753	29	977	184	7	3	1,086	676	34	246	213	27	25	2	17	6	1	0	9	19			
12/1/2021	3,301	83,429	11,370	1,734	9,822	1,482	66	1,261	411	35	28	3,301	77,046	5,682	8,681	777	31	1,018	193	7	3	1,141	705	35	243	218	28	25	2	18	6	1	0	9	19			
1/1/2022	3,292	83,553	11,419	1,735	9,867	1,487	66	1,261	412	34	28	3,292	77,149	5,404	8,716	773	31	1,023	193	7	3	1,150	713	35	238	219	27	25	2	18	6	1	0	9	19			
2/1/2022	2,967	75,538	10,336	1,569	8,930	1,346	60	1,141	372	31	25	2,967	69,763	5,775</																								



REDACTED

Winter Averages

Year	rn	rh	ch	cn	g41	g42	g43	g51	g52	g53	g54	r1	r3	r4	g41s	g42s	g43s	g51s	g52s	g53s	g54s	g41t	g42t	g43t	g51t	g52t	g53t	g54t	g41z	g42z	g43z	g51z	g52z	g53z	g54z
2018/2019	3,185	78,176	10,656	1,663	9,220	1,378	58	1,226	373	36	29	3,185	72,229	5,947	7,908	652	26	926	144	8	4	1,312	725	32	300	228	28	25	2	18	6	1	0	9	18
2019/2020	3,222	80,066	10,914	1,706	9,425	1,428	61	1,245	400	34	28	3,222	74,355	5,712	8,268	760	27	972	179	6	1	1,157	668	34	273	221	27	26	2	18	6	1	0	9	19
2020/2021	3,250	80,745	10,992	1,694	9,496	1,432	63	1,230	401	35	28	3,250	75,396	5,349	8,376	753	29	971	185	6	3	1,120	679	34	259	215	29	25	2	17	6	1	0	9	19
2021/2022	3,195	81,250	11,083	1,690	9,573	1,446	64	1,229	400	33	28	3,195	75,027	6,222	8,453	749	30	995	187	7	3	1,120	697	34	235	213	26	24	2	17	6	1	0	9	18
2022/2023	3,075	81,818	11,139	1,694	9,613	1,461	65	1,226	408	32	27	3,075	81,818	0	8,412	732	30	955	188	7	3	1,201	730	35	271	220	26	24	2	17	5	0	0	7	18
Forecasted Year																																			
2023/2024	3,238	84,378	11,505	1,711	9,941	1,500	64	1,247	406	33	25	3,238	84,378	0	8,774	783	30	997	189	6	3	1,168	717	34	250	217	27	22	2	17	6	1	0	7	16

REDACTED

Summer Averages

Year	rn	rh	ch	cn	g41	g42	g43	g51	g52	g53	g54	r1	r3	r4	g41s	g42s	g43s	g51s	g52s	g53s	g54s	g41t	g42t	g43t	g51t	g52t	g53t	g54t	g41z	g42z	g43z	g51z	g52z	g53z	g54z
2019	3,235	79,149	10,446	1,703	8,984	1,405	58	1,251	390	34	28	3,235	73,543	5,606	7,686	678	26	947	158	8	3	1,298	727	32	304	232	26	25	2	18	6	1	0	9	18
2020	3,293	81,121	10,747	1,717	9,244	1,440	63	1,248	405	35	29	3,293	75,841	5,280	8,049	763	27	966	183	6	1	1,195	677	36	282	222	29	28	2	17	6	1	0	9	19
2021	3,277	81,835	10,849	1,721	9,334	1,451	64	1,252	406	35	29	3,277	76,349	5,487	8,234	765	29	1,000	189	6	3	1,101	686	35	251	217	29	26	2	17	6	1	0	9	19
2022	3,185	81,914	10,865	1,706	9,344	1,457	65	1,242	405	32	27	3,185	77,767	4,147	8,178	736	30	981	193	7	3	1,166	721	35	262	211	24	23	2	17	6	1	0	8	17
2023	3,048	82,759	10,958	1,703	9,428	1,465	65	1,234	409	32	27	3,048	82,759	0	8,248	735	30	962	194	7	4	1,179	731	35	272	215	25	23	2	17	5	0	0	7	17
Forecasted Year																																			
2024	3,298	85,260	11,363	1,745	9,779	1,520	64	1,274	413	33	25	3,298	85,260	0	8,592	792	29	1,011	195	6	3	1,186	728	35	263	219	27	22	2	17	6	1	0	7	16

\*Note: 2023 is based on an average of the summer months may, june and july

REDACTED

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

DG 23-076

Winter 2023/2024 Cost of Gas and Summer 2024 Cost of Gas

Department of Energy Data Requests - Set 2 (COG)

Date Request Received: 9/22/23  
Request No: DOE 2-7 (COG)

Date of Response: 10/3/23  
Respondent: Deborah Gilbertson

---

**REQUEST:**

Reference: Liberty Response to DOE DR 2-6

Please calculate the Equivalent Bill growth rate **by rate classes** for your response to DOE DR 2-6 and provide the data in Live Excel format

**RESPONSE:**

Please see Attachment 23-076 DOE 2-7 (COG).xlsx. The compound annual growth rate for each rate class is calculated based on the average annual equivalent bills over the period 2018/19 through 2021/22 as shown in the “CAGR by rate class” tab. The 2021/22 gas year represents the most recent full year for which data is available.

REDACTED

CAGR by rate class

Yearly Average	rn	rh	ch	cn	g41	g42	g43	g51	g52	g53	g54	r1	r3	r4	g41s	g42s	g43s	g51s	g52s	g53s	g54s	g41t	g42t	g43t	g51t	g52t	g53t	g54t	g41z	g42z	g43z	g51z	g52z	g53z	g54z	
2018/2019		3,210	78,663	10,551	1,683	9,102	1,391	58	1,238	381	35	28	3,210	72,886	5,776	7,797	665	26	936	151	8	3	1,305	726	32	302	230	27	25	2	18	6	1	0	9	18
2021/2022		3,190	81,582	10,974	1,698	9,458	1,452	64	1,236	402	32	27	3,190	76,397	5,185	8,315	742	30	988	190	7	3	1,143	709	34	248	212	25	24	2	17	6	1	0	9	18
CAGR		-0.2%	1.2%	1.3%	0.3%	1.3%	1.4%	3.6%	-0.1%	1.8%	-2.5%	-1.3%	-0.2%	1.6%	-3.5%	2.2%	3.7%	4.9%	1.8%	7.9%	-3.8%	2.0%	-4.3%	-0.8%	2.5%	-6.3%	-2.6%	-2.2%	-1.8%	-0.1%	-2.0%	-1.0%	-5.9%	0.0%	-2.3%	-0.9%

Note: Yearly averages are derived from data in Attachment DOE DR 1-6 Tab A

\*Note: 21/22 is the most recent full year of data

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

DG 23-076

Winter 2023/2024 Cost of Gas and Summer 2024 Cost of Gas

Department of Energy Data Requests - Set 2 (COG)

Date Request Received: 9/22/23  
Request No: DOE 2-8 (COG)

Date of Response: 10/3/23  
Respondent: James King

---

**REQUEST:**

Reference: Liberty's August-September 2023 filing, Liberty's Response to DOE Set 1-2 in this docket.

The Department repeats this question, due to an inadvertent date error, corrected below. Please confirm that Liberty's answers to DOE DR 1-2 and DOE DR 1-3 are consistent with the corrected dates (appearing in bold below) or provide updated responses to DOE DR 1-2 and to DOE DR 1-3 consistent with the corrected dates.

In addition, please identify with the dollar figure for: i) the "carve-out for Decoupling Year 4 (DY4), ii) that portion of Decoupling Year 3 (DY3) that was carved out, and iii) the entire RDAF value for all of DY3. For DY3 please show the "amount collected" and "amount to be collected."

Updated DOE 1-2:

*In evaluating Liberty's filing, the DOE requires an "apples to apples" comparison between last year's COG approved rates and the Liberty's proposed rates, including over/under calculations and forecasting.*

*"Please provide the following:*

- A. Please cross-reference the schedules and tables provided in Liberty's current August-September filing with the schedules and tables Liberty filed in Docket No. DG 22-045 as of October 10, 2023 (wherein rates reflected "carve outs" for RDAF and GasHolder). Please identify any changed assumption, categories or formula Liberty has made in this filing as compared to the DG 22-045 filing ultimately approved by the Commission Order No. 26,715 and 26,737.*
- B. Liberty's testimony purports to provide a comparison of Winter 2022-2023 rates and the proposed Winter 2023-2024 rates based upon "rates effective November 1, ~~2022~~ **2023**." See Culbertson & King Testimony at 007. It further appears that Liberty's rates include what Liberty has identified as an anticipated RDAF under-collection for an "uncollected" amount from decoupling year 3 and an RDAF under collection all of decoupling year 4. Those*

REDACTED

values remain in dispute. Liberty's proposed rates seem to include Gas Holder expenses that were "carved out" of November rates. See Dockets No. DG 22-041 and DG 22-045. Please comment and confirm and/or explain.

- C. Given that the rates effective November 1, ~~2022~~ ~~2023~~ were updated by the Commission on November 30, ~~2022~~ ~~2023~~ (in light of Liberty's self-directed changes) and given that the COG Supply and LDAC processes have been newly divided, please provide a comparison of the proposed Winter rates and the 2022-2023 Winter rates based on the November 1, 2023 and November 30, 2023 Order. (See Culbertson and King Testimony at 016 comparing Summer Rates to rates in effect per Order No. 26,715 and 26,737). This comparison should include the following tables and a brief narrative description similar to the description provided in Liberty's initial testimony, adjusted to reflect the updated calculations.

Please provide a table for such as the one provided in Culbertson and King Testimony at 007, including a row for the FPO rates, for the following: i) the overall rates for each category of rate class including COG and LDAC, ii) the LDAC rates for each category of rate class, and iii) the COG (Supply) rates for each category of rate class.

Please identify whether C&I G41 and G42 are what Liberty generically describes as "low winter use" or "high winter use." Please identify whether C&I G 52 is "low winter use" or high winter use." See Order No. 26,715 and Order no. 26,737 (including but not limited to Liberty's correction of miscategorizing low-use and high-use rate classes).

Please provide the same tables for the Summer COG period.

- D. Do Liberty's proposed rate calculations include what Liberty states is a decoupling year under-collection of approximately \$4 million stemming from decoupling year 1 and 2? See Docket No. DG 22-041.

### **RESPONSE:**

In responding to the first set of data requests, the Company assumed the corrected dates the DOE provided in this updated data request. Responses to DOE 1-2 and DOE 1-3 are consistent with the corrected dates.

It is unclear to the Company what is meant by "carved out" as it relates to the RDAF in calculating the COG. Amounts associated with RDAF are not, nor were they previously, included in the calculation of COG. The Company has provided the requested amounts in the table below.

Decoupling Year	RDAF Deferral	Collections	
		2022	2023
3	\$3,813,594	\$1,255,284.51	\$70,451.65
4	\$9,365,033	\$70,451.65	0 (could not collect)

REDACTED

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

DG 23-076

Winter 2023/2024 Cost of Gas and Summer 2024 Cost of Gas

Department of Energy Data Requests - Set 2 (COG)

Date Request Received: 9/22/23  
Request No: DOE 2-9 (COG)

Date of Response: 10/3/23  
Respondent: James King

---

**REQUEST:**

Reference: Liberty's August-September 2023 filing, Liberty's Response to DOE Set DR 1-2 in this docket; Order No. 26,715 (Oct. 31, 2022); Order No.26,737 (November 30, 2022); DOE's Position Statement (November 22, 2022) (Liberty improperly altered energy efficiency charge and certain C&I rates) *see generally Appeal of Pennichuck Water Works*, 120 N.H. 562, 565-66 (1980) (prohibition on retroactive ratemaking)

In the opinion of the Department, Liberty improperly applied rates made effective November 30, 2022 on November 1, 2022, which would constitute retroactive ratemaking. Does Liberty agree?

In the opinion of the Department, Liberty improperly construed Order 26,737 (Nov. 30, 2022), to require retroactive ratemaking, when the proper process would have been for Liberty to propose applying rates authorized on October 31, 2022 for the month of November 2022 as effective November 1, 2022 and then propose rates effective for the month of December 2022, to result in rates for the period from November 1-December 31, 2022 to "average" the rates made effective on November 30, 2022. Please do the necessary calculations to follow the Department's preferred approach and show Liberty's work to calculate this correction. Even if in Liberty's opinion the adjustment would be *de minimus*, please identify the under- or (over) -collection by rate class for the period November 1- December 31, 2023. Please state whether Liberty agreed that its over/under/(over)- calculation must be updated by the results of these calculations.

**RESPONSE:**

No, Liberty does not agree that it improperly applied rates made effective November 30, 2022, on November 1, 2022, nor did the DOE, which prescribed and subsequently confirmed Liberty's interpretation in the fall of 2022. *See* Docket No. DG 22-045, DOE Letter (filed Oct 10, 2022) ([22-045 2022-10-10 NHDOE RECOMMENDED-TREATMENT.PDF](#)) (confirming the November 1, 2022, effective date). Also, *see* Docket No. DG 22-045, DOE Letter (filed November 22, 2022) ( [22-045 2022-11-22 NHDOE POSITION-STATEMENT.PDF](#)). (affirming compliance rates). Therefore, Liberty does not agree that any updates should be made.

REDACTED

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

DG 23-076

Winter 2023/2024 Cost of Gas and Summer 2024 Cost of Gas

Department of Energy Data Requests - Set 2 (COG)

Date Request Received: 9/22/23  
Request No: DOE 2-10 (COG)

Date of Response: 10/3/23  
Respondent: James King

---

**REQUEST:**

References: Liberty's response to DOE DR 1-11, including DOE 1-11 Zip; Dkt. No. DG 21-130 Testimony of Simek and Gilbertson (FPO gas is \$0.0200 higher per therm than the initial proposed COG rate.)

The Fixed-Price Offer letter that Liberty has indicated it will send to residential customers on or about October 1, 2023 states that "the 2022-2023 FPO Gas Supply Charge that was submitted to the New Hampshire Public Utilities Commission is \$1.7535 per therm (\$0.9644 per therm for customers on Fuel Assistance)." Liberty further states "These rates are not guaranteed until we receive a decision from the NHPUC. A decision is expected prior to November 1. Visit [www.libertyenergyandwater.com](http://www.libertyenergyandwater.com) after November 1<sup>st</sup> to see the final approved rate." Liberty's draft letter also says customers must respond "on or before October 24, 2022 (sic 2023)."

It appears that Liberty will require customers who wish to accept the Fixed Price Offer Rate (FPO) rate, to make a final decision before the rate is known. In the past the FPO rate was described as a specific amount higher than the non-FPO rate as approved on November 1. How does Liberty's current (draft) letter give customers an informed choice or meet tariff requirements for EnergyNorth and Liberty-Keene? See Tarif No. 10, FPO is \$0.02 cents higher per therm than non-FPO gas.

It further appears that Liberty has provided last year's FPO letter. Please provide the letter Liberty expects to send to customers regarding the FPO offer for the Winter 2-023-2024 season.

**RESPONSE:**

At the time of the response to DOE 1-11 the Winter 2023–2024 FPO letters were not yet available. Please see Attachment 23-076 DOE 2-10 for the Winter 2023–2024 FPO letters. Both the EnergyNorth and Liberty-Keene letters specify that applications to the program are to be returned to the Company on or before October 26, 2023. Furthermore, while not specifically required by Liberty's Tariff No. 11, each letter does reflect that the FPO rate is \$0.02 higher than the non-FPO rate:



REDACTED

“Fixed Price Option Program. Fixed Price Option Program. An alternative to the traditional Winter Period cost of gas pricing mechanism may be elected by a residential customer (rates R-1, R-3, R-4, R-5, or R-6) pursuant to the Company’s Fixed Price Option Program (the “Program”). The Company may offer up to 50% of its weather normalized firm sales for the prior Winter Period under the Program. The cost of gas rate offered under the Program will remain fixed for all Winter Period deliveries commencing November 1 and ending April 30. The Company shall submit to the New Hampshire Public Utilities Commission on or before September 1 of each year a copy of the fixed price option computation. Once elected, customers must remain on the Program for the duration of the Winter Period, unless service is terminated. There are no maximum or minimum usage levels. No sign up fees apply”

Section 17 (Q) of NHPUC No. 11. Nevertheless, Liberty appreciates Staff’s concerns about how the case schedule in the instant proceeding causes the FPO letters to be sent to customers with unapproved FPO rates and would be willing to work with DOE on how to improve FPO, including the case schedule for future filings and letters, before the 2024 filing for Winter 2024–2025.

REDACTED



Docket No. DG 23-076  
Attachment 23-076 DOE 2-10  
Page 1 of 4  
**Liberty Energy and Water**

September 25, 2023

**Fixed Price Option (FPO)**

**Account Number** 200000066833  
**Service Address** 756 ABITA SPRINGS  
CONCORD NH  
US 03301-0221

Dear Mathew J RSHOWKEEN TEST Do not use:

Each fall, Liberty offers you the opportunity to "lock in" the price per therm for the Gas Supply Charge portion of your bills, from November 1 through April 30. If you are enrolled in this program, you will pay one fixed price per therm for the Gas Supply Charge portion of your bill during this period, even if the price of gas changes during the heating season.

**Applications for the program must be returned on or before October 26, 2023.** Energy prices including gas prices remain volatile as in years past and Liberty expects many customers will consider the Fixed Price Option (FPO) program. If you have multiple accounts, please return one form for each service address and account number. This program is available to customers who are billed on Budget Billing as well as those who are billed on a regular billing schedule.

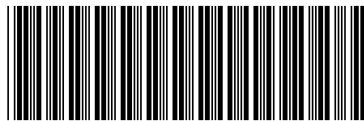
**Does the FPO represent the entire amount on my monthly gas bill?**

No. Your monthly gas bill has two main components: (1) a Gas Delivery Charge and (2) a Gas Supply Charge. The FPO is for the Gas Supply Charge. (The largest portion of your bill)

**What is the "Fixed Price" for the 2023 heating season?**

The **2023** FPO Gas Supply Charge that was submitted to the New Hampshire Public Utility Commission for approval is **\$0.6375** per therm (**\$0.3506** per therm for customers on Low Income Rate). Approval of the rate is expected prior to November 1.

Pay online at [LibertyEnergyandWater.com](http://LibertyEnergyandWater.com), or return this portion with your payment. Please include your account number on your check and make payable to Liberty Utilities.



**Account Number:** 200000066833  
**Service Address:** 756 ABITA SPRINGS



**YES**, please sign me up to participate in the Fixed Price Option (FPO). This program locks in the Gas Supply Charge price listed above for the heating season beginning November 01, 2023 and ending April 30, 2024

If you would like to receive confirmation that you have been successfully enrolled in the FPO, please provide us with your email address: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**REMIT TO:**

Liberty  
PO Box 1380  
Londonderry, NH 03053

000018

REDACTED



Docket No. DG 23-076  
Attachment 23-076 DOE 2-10  
Page 2 of 4

**What will my Gas Supply Charge price be this winter if I don't enroll in the FPO?**

As of today's date, we estimate that the Gas Supply Charge price for the winter will be approximately **\$0.6175** per therm (**\$0.3396** per therm for customers on Low Income Rate). This non-guaranteed price may increase if the market price of gas increases during the winter or decrease if the market price of gas decreases. Price fluctuations are market-driven, and it is difficult for Liberty to predict what those market conditions or prices will be.

**Are there any fees to sign up or minimum or maximum usage requirements?**

No. There are no sign-up fees or minimum or maximum usage levels. However, the program is non-transferable, and customers must remain on the program through April 30, 2024. If you move to a new location, the FPO rate will apply at your new location through April 30, 2024.

**How do I sign up?**

Fill out the attached coupon and return it in the enclosed envelope on or before October 26, 2023. You will be notified whether or not you are enrolled in the FPO. Enrollment acceptance is based on a timely response.

Sincerely,  
Liberty



**Phone**  
800-833-4200



**Online**  
[www.LibertyEnergyandWater.com](http://www.LibertyEnergyandWater.com)

REDACTED



Docket No. DG 23-076  
Attachment 23-076 DOE 2-10  
Page 3 of 4  
**Liberty Energy and Water**

September 26, 2023

**Fixed Price Option (FPO)**

**Account Number** 200004024689

**Service Address** 30 HOWARD ST APT 1  
KEENE NH US 03431-3036

Dear DORIAN PETRANECH:

Each fall, Liberty offers you the opportunity to "lock in" the price per therm for the Gas Supply Charge portion of your bills, from November 1 through April 30. If you are enrolled in this program, you will pay one fixed price per therm for the Gas Supply Charge portion of your bill during this period, even if the price of gas changes during the heating season.

**Applications for the program must be returned on or before October 26, 2023.** Energy prices including gas prices remain volatile as in years past and Liberty expects many customers will consider the Fixed Price Option (FPO) program. If you have multiple accounts, please return one form for each service address and account number. This program is available to customers who are billed on Budget Billing as well as those who are billed on a regular billing schedule.

**Does the FPO represent the entire amount on my monthly gas bill?**

No. Your monthly gas bill has two main components: (1) a Gas Delivery Charge and (2) a Gas Supply Charge. The FPO is for the Gas Supply Charge. (The largest portion of your bill)

**What is the "Fixed Price" for the 2023 heating season?**

The **2023** FPO Gas Supply Charge that was submitted to the New Hampshire Public Utility Commission for approval is **\$1.4207** per therm (**\$0.7814** per therm for customers on Low Income Rate). Approval of the rate is expected prior to November 1.

Pay online at [LibertyEnergyandWater.com](http://LibertyEnergyandWater.com), or return this portion with your payment. Please include your account number on your check and make payable to Liberty Utilities.



**Account Number:** 200004024689  
**Service Address:** 30 HOWARD ST APT 1



**YES**, please sign me up to participate in the Fixed Price Option (FPO). This program locks in the Gas Supply Charge price listed above for the heating season beginning November 01, 2023 and ending April 30, 2024

If you would like to receive confirmation that you have been successfully enrolled in the FPO, please provide us with your email address: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**REMIT TO:**

Liberty  
PO Box 1380  
Londonderry, NH 03053

000020

REDACTED



Docket No. DG 23-076  
Attachment 23-076 DOE 2-10  
Page 4 of 4

**What will my Gas Supply Charge price be this winter if I don't enroll in the FPO?**

As of today's date, we estimate that the Gas Supply Charge price for the winter will be approximately **\$1.4007** per therm (**\$0.7704** per therm for customers on Low Income Rate). This non-guaranteed price may increase if the market price of gas increases during the winter or decrease if the market price of gas decreases. Price fluctuations are market-driven, and it is difficult for Liberty to predict what those market conditions or prices will be.

**Are there any fees to sign up or minimum or maximum usage requirements?**

No. There are no sign-up fees or minimum or maximum usage levels. However, the program is non-transferable, and customers must remain on the program through April 30, 2024. If you move to a new location, the FPO rate will apply at your new location through April 30, 2024.

**How do I sign up?**

Fill out the attached coupon and return it in the enclosed envelope on or before October 26, 2023. You will be notified whether or not you are enrolled in the FPO. Enrollment acceptance is based on a timely response.

Sincerely,  
Liberty



**Phone**  
800-833-4200



**Online**  
[www.LibertyEnergyandWater.com](http://www.LibertyEnergyandWater.com)

REDACTED

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

DG 23-076

Winter 2023/2024 Cost of Gas and Summer 2024 Cost of Gas

Department of Energy Data Requests - Set 2 (COG)

Date Request Received: 9/22/23  
Request No: DOE 2-11 (COG)

Date of Response: 10/3/23  
Respondent: William Clark

---

**REQUEST:**

Reference: Liberty's response to DOE DR 1-8

Please identify all “decompression skids” that Liberty rents, owns, or is considering purchasing that will or may be used to decompress RNG, CNG, or LNG. For each decompression skid please identify the location or proposed location; whether the facility is rented or owned, or something else; the age of the decompression skid, the volume (by type of gas) that Liberty will or expects to decompress and what Liberty pays or will pay by month, year and term for use of the decompression skid. Please list maintenance separately. Please also describe where and how Liberty anticipates that the gas will be used.

Please explain any adoptions or changes that would need to be made, if any, to switch the decompression skid from LNG to CNG; from LNG to RNG; from CNG to RNG, from RNG to CNG and from RNG to LNG.

**RESPONSE:**

The sole decompression facility serving Liberty customers is located on Production Ave in Keene NH, which serves the Monadnock Marketplace with CNG. The facility is leased from the CNG provider, XNG Natural Gas. See Confidential Attachment 23-076 DOE 2-11 (COG) for a copy of the XNG-Liberty lease, which has the pricing terms.

It is not possible to switch a decompression skid from LNG to, or from, CNG. LNG is a cryogenic liquid and CNG is a highly compressed gas. RNG is chemically interchangeable with conventional natural gas and no modifications would be required to an existing CNG or LNG facility to receive RNG.

Confidential Attachment 23-076 DOE 2-11 (COG) contains pricing and other information that is “confidential, commercial, or financial information” and is thus 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

REDACTED

faith basis to seek confidential treatment of this information and asserts confidentiality pursuant to the above statute and rules.

REDACTED

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

DG 23-076

Winter 2023/2024 Cost of Gas and Summer 2024 Cost of Gas

Department of Energy Data Requests - Set 2 (COG)

Date Request Received: 9/22/23  
Request No: DOE 2-12 (COG)

Date of Response: 10/3/23  
Respondent: William Clark

---

**REQUEST:**

References: Liberty's response to DOE DR 1-5; Liberty's remarks at the 2023 Energy Summit held September 18, 2023

Please identify any entity that submitted a bid to Liberty's recent RNG RFP with whom Liberty is still engaged in discussions that may (or have) lead to a contract for RNG supply, including "brown RNG" (Liberty's term for the purchase of RNG without environmental attributes) and "green RNG" (Liberty's term for the purchase of RNG with environmental attributes, including but not limited to on-going negotiations, any contract awaiting internal "sign off." In particular, please explain Liberty's response to DOE DR 1-5 and Liberty's comments at the 2023 Energy Summit that seems to support near-term use of RNG.

Please provide a narrative description of any Liberty plan or project that may result in the purchase or use of brown or green RNG by EnergyNorth customers or Liberty-Keene customers in the next eighteen months, including but not limited to any tariff changes related to brown or green RNG that Liberty is drafting, contemplating or researching.

For any pending, potential agreement or project under discussion wherein Liberty may obtain brown or green RNG in the next eighteen months, please provide responses to DOE DR 1-5 "A" through "H."

**RESPONSE:**

The only RNG RFP issued by Liberty was in November of 2022. This was the RNG RFP referenced at the NH Energy Summit. The response to a question at the Summit did not indicate near-term use of RNG. The Company's response to DOE 1-5 is accurate and current. The details of the November 2022 RFP were provided in response to DOE 1-9 in Docket No. DG 23-034, the Keene Division Summer Cost of Gas docket. That response also remains accurate and current.