DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-1 Date of Response: 10/9/23 Respondent: James King

REQUEST:

Reference: Testimony at Bates p. 10 and tab "Unaccounted For" in submitted Live Excel file (that provides the underlying calculations showing the unaccounted-for volumes of gas and the referenced 0.64% LAUF). Please separate the amounts of unaccounted gas for CNG and air propane. Please provide these calculations in a Live Excel format.

<u>RESPONSE</u>:

With the Company's conversion to SAP, Company personnel are no longer able to separate the customer account billing between CNG and Propane to complete the separate LAUF calculations.

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-2 Date of Response: 10/9/23 Respondent: Deborah Gilbertson

REQUEST:

Reference: Testimony at Bates pp.10-11 and 26 (Schedule E). Please explain how the projections depicted in Schedule E were calculated.

RESPONSE:

Because there is no publication that forecasts the market price of propane at Keene, NH, the Company uses Schedule E to create a reasonable estimate of what spot prices are likely to be for propane delivered to Keene each month of the year. The Company begins with the per-gallon market price at Mt. Belvieu, Texas. Mt. Belvieu's future pricing for propane is analogous to NYMEX futures for natural gas.

Next, the Company estimates the basis differential cost to bring the propane from Mt. Belvieu to Keene, NH. The basis pricing incorporates transportation rates such as pipeline and trucking costs. The company also estimates probable fees that brokers and suppliers may add to cover their cost of service.

These costs, when added together, create an estimated price of propane delivered to Keene. Please see category descriptions, items 1–9, which further explain the various components of the spot price of propane.

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-3 Date of Response: 10/9/23 Respondent: James King

REQUEST:

Reference: Testimony at Bates pp. 12-13. Please provide a copy of the FPO letter that will be mailed to all customers by October 1 advising them of the FPO program, the FPO rate, and the procedures to enroll.

RESPONSE:

Please see Attachment 23-084 DOE 1-3.



September 26, 2023

Fixed Price Option (FPO)Account Number200004024689Service Address30 HOWARD ST APT 1KEENE 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, or return this portion with your payment. Please include your account number on your check and make payable to Liberty Utilities.

Liberty [•]	
YES, please sign me up to participate in	

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 I ke to receive confirmation that you have been successfully enrolled in the FPO, please provide us with your email address: _____

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



REMIT TO:

Liberty PO Box 1380 Londonderry, NH 03053

Date:_

Signature:



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

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-4 Date of Response: 10/9/23 Respondent: James King

REQUEST:

Reference: Testimony at Bates pp. 32-33 (Schedule K-1 and K-2). Please explain the LDAC rate that was applied to the residential heating bill and explain the Order from which it was approved.

RESPONSE:

The current residential LDAC rate is \$0.1180. The rate was authorized by NHPUC Order No. 26,808 dated April 28, 2023, in Docket No. DG 20-105. The prior season Residential LDAC rate used for November and December, \$0.0186, was authorized by NHPU Order No. 26,737, dated November 30, 2022, in Docket Nos. DG 22-045 and DG 22-057. The residential rate used for January through April, \$0.1113, was authorized by NHPUC *Nisi* Order No. 26,745 dated December 14, 2022, in Docket No. DE 22-081.

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-5 Date of Response: 10/9/23 Respondent: Deborah Gilbertson

REQUEST:

Do the proposed rates include any costs associated with RNG projected or actual? Please describe any plans Liberty-Keene may have in the next twenty-four (24) months to serve RNG in Keene.

RESPONSE:

The proposed rates do not include RNG. The Company has no firm plans to serve RNG in Keene within the next twenty-four months.

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-7 Date of Response: 10/9/23 Respondent: William Clark

REQUEST:

Please describe and include any supporting documentation on Liberty-Keene's intent to convert Keene air propane customers and/or any new customers in the Keene air to CNG.

RESPONSE:

The conversion of the Keene system from propane-air to LNG/CNG is included in Docket No. DG 23-067, Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Request for Change in Distribution Rates. The details are contained in the Direct Testimony of Jacob Drouse, Morgan MacGregor, and Heather Tebbetts. Their testimony can be found here:

https://www.puc.nh.gov/Regulatory/Docketbk/2023/23-067/MOTIONS-OBJECTIONS/23-067 2023-07-27 ENGI TESTIMONY-DROUSE-MACGREGOR-TEBBETTS.PDF

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-8 Date of Response: 10/9/23 Respondent: Deborah Gilbertson

REQUEST:

Reference: Bates p.30 (Schedule I). Explain how the Company calculated the Base Use, Actual Calendar Month Degree Days, and Normal Calendar Month Degree Days for the months beginning November 2023 and ending April 2024.

<u>RESPONSE</u>:

The base use was calculated using projected 2023 summer volumes. The Company relied upon August 2023 projected Sendout volumes to delineate the base usage in the winter period.

Actual calendar month degree days were taken from a recording device located at 207 Emerald Street in Keene at the Company's plant location.

The normal calendar month degree days are a simple average of monthly degree days over the last twenty years.

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-9 Date of Response: 10/9/23 Respondent: Deborah Gilbertson

REQUEST:

Reference: Bates p.30 (Schedule I). Explain how the Company calculated Actual Firm Sendout for the months beginning November 2023 and April 2024.

RESPONSE:

Actual Firm Sendout is measured by actual meter readings taken at the beginning and end of each month. The Company then adds the CNG metered volume and propane air metered volume together to get total Actual Firm Sendout for each calendar month.

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-10 Date of Response: 10/9/23 Respondent: Deborah Gilbertson

REQUEST:

Reference: Bates p. 31 (Schedule J). Explain how the Company calculated the number of residential and commercial customers for the months beginning November 2023 and ending April 2024.

RESPONSE:

The number of customers represented in Schedule J is the calendarized equivalent bill count from November 2021 to April 2022. The bill counts for the future period beginning November 2023 and ending April 2024 are identical since there is zero growth expected for Keene. Normally, the Company would have used the calendarized equivalent bill count from November 2022 through April 2023, but at the time of the filing that data was not readily available. November 2021 through April 2022 was used as a proxy.

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-11 Date of Response: 10/9/23 Respondent: Deborah Gilbertson

REQUEST:

Reference: Bates p. 31 (Schedule J). Explain how the Company calculated the amount of sales for the months beginning November 2023 and ending April 2024. Please provide these calculations in a Live Excel format.

RESPONSE:

The sales volumes for the months beginning November 2023 and ending April 2024 are the allocated calendarized equivalent sales volumes from November 2021 through April 2022. These can be found on Schedule J in column 1, and in Attachment 23-084 DOE 1-11.xlsx in columns labeled 'allocate.com.sales' and 'allocate.resi.sales.'

Because Keene has zero growth, the Company relies on the prior period's calendarized sales to create the weather normalized Sales forecast for the next period (November 2023 through April 2024). The company then allocates the Sales volumes to the Sendout volumes to align Sales to Sendout in the month in which they occurred.

Normally the Company would have used calendarized equivalent bill sales from November 2022 through 2023, but at the time of the filing, the data was not readily available. November 2021 through April 2022 was used as a proxy.

Please see Attachment 23-084 DOE 1-11.xlsx.

DG 23-084 Exhibit 4

date	total.sendout	total.company.use	total.sendout.w.cu	sendout.excluding.cu	less losses	total.sales	com.sales	resi.sales	com.ratio	resi.ratio	allocate.com.sales	allocate.resi.sales	allocate.total.sales
11/1/2022	147,890	4,067	151,957	147,890	145,672	138,296	105,794	32,502	0.76	0.24	111,436	34,236	145,672
12/1/2022	235,578	5,703	241,281	235,578	232,044	210,481	160,647	49,834	0.76	0.24	177,105	54,939	232,044
1/1/2023	229,858	5,556	235,414	229,858	226,410	260,146	198,974	61,172	0.76	0.24	173,171	53,239	226,410
2/1/2023	222,830	5,346	228,176	222,830	219,488	228,847	176,143	52,704	0.77	0.23	168,939	50,549	219,488
3/1/2023	190,883	4,832	195,715	190,883	188,020	188,282	145,642	42,640	0.77	0.23	145,439	42,581	188,020
4/1/2023	107,916	5,741	113,657	107,916	106,297	119,345	92,776	26,569	0.78	0.22	82,633	23,664	106,297
total	1,134,955.00	31,245.00	1,166,200.00	1,134,955.00	1,117,930.68	1,145,397.29	879,975.68	265,421.61			858,722.81	259,207.86	1,117,930.68
	ck	ck	ck	ck	ck								ck
loss	0.015												

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-12 Date of Response: 10/9/23 Respondent: Deborah Gilbertson

REQUEST:

Reference: Bates p. 31 (Schedule J). Explain how the Company calculated the Base Load for the months beginning November 2023 and ending April 2024. Please provide these calculations in a Live Excel format.

<u>RESPONSE</u>:

The base use was calculated using projected 2023 summer sales volumes, which were obtained from Schedule J in the Summer 2023 Cost of gas filing. The Company relied upon August 2023 projected Sales volumes, which were created by weather normalizing the actual August Sendout Sales volumes from the summer of 2022.

Please see Attachment 23-084 DOE 1-12.xlsx.

DG 23-084 Exhibit 4

SCHEDULE J SUMMER 2023 COG Filing

			LIBERTYUT		NORTH NATURAL			NE DIVISION			
Period	Customers	Sales	Base Load	Heating Load	Monthly Actual Degree Days	Monthly Normal Degree Days	Colder (Warmer) Than Normal	Actual Unit Heat Load Therm/DD	Weather Adjustment	Normal Heat Load	Normal F Billing Cy Therm
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
				(1) - (2)			(4) - (5)	(3) / (4)	(6) X (7)	(3) + (8)	(1) - (3) +
May-22	884	12,109	6,136	5,973	250	299	(49)	23.89	1,171	7,144	13,280
Jun-22	843	6,878	6,136	742	109	103	6	6.81	(41)	701	6,837
Jul-22	862	6,230	6,136	94	10	23	(13)	9.40	122	216	6,352
Aug-22	860	6,042	6,136	0	22	43	(21)	0.00	0	0	6,042
Sep-22	862	8,528	6,136	2,392	262	194	68	9.13	(621)	1,771	7,907
Oct-22	893	19,628	6,136	13,493	575	537	38	23.47	(892)	12,601	18,737
Total		59,414	36,814	22,694	1,228	1,199	29	8.98	(260)	22,434	59,155
			LIBERTY UT	LITIES (ENERGY	NORTH NATURAL	GAS) CORP. D/B/	A LIBERTY - KEEI	NE DIVISION			
			1	Weather N	ormalization - Sales	(Therms) - Rate C	Commercial				
					Monthly Actual	Monthly Normal	Colder (Warmer)	Actual Unit Heat Load	Weather	Normal	Normal F Billing Cy
Period	Customers	Sales	Base Load	Heating Load	Degree Days	Degree Days	Than Normal	Therm/DD	Adjustment	Heat Load	Therm
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
				(1) - (3)			(4) - (5)	(3) / (4)	(6) X (7)	(3) + (8)	(1) - (3) +
May-22	323	51,043	41,056	9,987	250	299	(49)	39.95	1,957	11,945	53,000
Jun-22	311	42,243	41,056	1,187	109	103	6	10.89	(65)	1,122	42,177
Jul-22	319	41,060	41,056	4	10	23	(13)	0.44	6	10	41,066
Aug-22	317	41,051	41,056	0	22	43	(21)	0.00	0	0	41,051
Sep-22	318	46,294	41,056	5,239	262	194	68	20.00	(1,360)	3,879	44,935
Oct-22	313	74,455	41,056	33,399	575	537	38	58.09	(2,207)	31,192	72,248
Total		296,146	246,334	49,816	1,228	1,199	29	57.55	(1,669)	48,147	294,47
Total		296,146	246,334	49,816	1,228	1,199	29	57.55	(1,669)	48,147	294,47
Total											
Total				Summary	- Total Summer Sea	ason Sales	-				
Totai					Actual 2022	Normalized	-				
Total				May	<u>Actual 2022</u> 63,152	<u>Normalized</u> 66,280	-				
Total				May June	<u>Actual 2022</u> 63,152 49,120	<u>Normalized</u> 66,280 49,014	-				
Total				May June July	<u>Actual 2022</u> 63,152 49,120 47,290	2 <u>Normalized</u> 66,280 49,014 47,418	-				
Total				May June July August	<u>Actual 2022</u> 63,152 49,120 47,290 47,093	<u>Normalized</u> 66,280 49,014 47,418 47,093	-				
Total				May June July	<u>Actual 2022</u> 63,152 49,120 47,290	2 <u>Normalized</u> 66,280 49,014 47,418	-				

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-13 Date of Response: 10/8/23 Respondent: James King

REQUEST:

Reference DG 23-034; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty – Keene Division Summer 2023 Cost of Gas – October 2023 COG Adjustment Effective 2023-10-01 (submitted on September 22, 2023).

- a. Please describe the reason(s) for the proposed rate change to be effective on October 1, 2023.
- b. Please describe what impact(s) would it have on Liberty-Keene Summer 2023 Cost of Gas (COG) reconciliation.
- c. Please describe and quantify any impacts this filing would have on the current Keene COG filing including but not limited to any impact on the (over)/under-recovery balance reported on Schedule B page 1 (i.e., tab B Pg1) and page 2 (i.e., tab B Pg2).

RESPONSE:

a. There were two main drivers to the proposed rate change effective October 1, 2023. First, when Liberty submitted the Cost of Gas filing for rates effective May 1, 2023, the beginning balance was based on the Summer 2022 reconciliation, which included the net incremental cost adjustment and seasonal adjustments for revenues. These adjustments were originally booked to the deferral account in the wrong direction; therefore, the projected beginning balance and the actual deferral account beginning balance did not match. With the October trigger filing the Company noticed that the beginning balance being used was not the actual deferral account beginning balance for May 1, 2023, and updated the beginning balance to match what the deferral account had shown as of May 1. In May, the company corrected the direction of the two adjustments, which were included in the October trigger filing. The second factor contributing to the October 1 rate change was that CNG and propane adjustments were made to bring the calculated costs in line with the amounts recorded in the deferral account. Together, the adjustments the Company made to the Cost of Gas model bring the figures in Schedule B in line with the actual amounts booked to the deferral account to ensure that the amount the Company is collecting is the appropriate amount to cover the costs.

- b. The goal of the cost of gas trigger is to allow the Company to collect the appropriate amount of revenue to cover its costs. The objective of drop in rates for effect October 1, 2023 is to bring the Company's over collection as close to zero as possible. Without the changes made by the Company, the Summer 2023 period would likely end with a larger over collection than had the Company not made these changes.
- c. The changes the Company made in Docket No. DG 23-034 for the October 2023 trigger will have no impact on the instant filing in Docket No. 23-084. For both ENNG and the Keene division, the Company keeps two separate sets of deferral accounts for the summer and winter period.

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-14 Date of Response: 10/9/23 Respondent: Deborah Gilbertson James Bonner

REQUEST:

Please provide information on:

- a. The customer count associated with past Winter 2022-2023 and current Winter 2023-2024 <u>air propane</u> (therm) sales.
- b. The equivalent bill (EB) count associated with past Winter 2022-2023 and current Winter 2023-2024 <u>air propane</u> (therm) sales.
- c. The customer count associated with past Winter 2022-2023 and current Winter 2023-2024 <u>CNG</u> (therm) sales.
- d. The equivalent bill (EB) count associated with past Winter 2022-2023 and current Winter 2023-2024 <u>CNG</u> (therm) sales.

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.
- b. Presently the Company does not have a report within the newly implemented SAP billing system which can be generated to separate billed customers by fuel type (propane vs CNG). To answer this question with the precise equivalent bill counts requested, it would be a manual, time-consuming effort. There are 23 active locations which are currently being served by CNG on the Keene distribution system.
- c. Please see response a.
- d. Please see response b.

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-15 Date of Response: 10/8/23 Respondent: James King James Bonner

REQUEST:

Reference Liberty-EnergyNorth's August-September 2023 filing, Dkt. 22-045, Exhibit 31 and 32. Please provide similar Excel spreadsheets for Liberty-Keene for Decoupling Year 4 (DY4, which spans September 1, 2021 to August 31, 2022) and DY5 (i.e., September 1, 2022 to August 31, 2023).

RESPONSE:

Objection by counsel. This docket addresses the Keene Division Cost of Gas only. It does not address the RDAF or any issues related to decoupling as those issues will be addressed in Docket Nos. DG 22-045 and DG 23-076 for all of Liberty's customers, including the Keene Division. Thus, this request does not seek information relevant to this docket, nor does it seek information that may lead to relevant information. "If we perceive of no circumstance in which the requested data would be relevant, we will deny a request to compel its production." Order No. 25,789 at 3 (June 5, 2015). Therefore, the Company respectfully declines to respond.

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1

Date Request Received: 9/28/23 Request No: DOE 1-16 Date of Response: 10/9/23 Respondent: James King James Bonner

REQUEST:

Reference Liberty-EnergyNorth's August-September 2023 filing, Dkt. 22-045, Exhibit 31 and 32.

For Liberty-Keene and for each month in DY4 and DY5, please provide:

- a. For each month in DY5, please provide therm consumption by each rate class **and** by <u>time</u>. See attached Excel tab "Report 1 Detailed Therm Sales".
- b. Equivalent Bill (EB) counts <u>by each rate class **and** by time</u>. See attached Excel tab "Report 2 - Detailed EB".
- c. For each month in DY5, please provide Actual Revenue by each rate class **and** by time. See attached Excel tab "Report 3 Detailed Actual Rev".

RESPONSE:

Objection by counsel. This docket addresses the Keene Division Cost of Gas only. It does not address the RDAF or any issues related to decoupling as those issues will be addressed in Docket No. DG 23-076 for all of Liberty's customers, including the Keene Division. Thus, this request does not seek information relevant to this docket, nor does it seek information that may lead to relevant information. "If we perceive of no circumstance in which the requested data would be relevant, we will deny a request to compel its production." Order No. 25,789 at 3 (June 5, 2015). Therefore, the Company respectfully declines to respond.

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1 (Supplemental)

Date Request Received: 9/29/23 Request No: DOE 1-17 Date of Response: 10/9/23 Respondent: James King

REQUEST:

Reference: Liberty-Keene Winter 2023-2024 COG Model (Keene Model) - Tab "Unaccounted For". Are the month labels on Line 2 correctly identified? If not, please explain what would be the correct labeling.

RESPONSE:

Yes, the month labels are correctly identified. The LAUF calculation is based on the 12-month data for July 2022 through June 2023.

DG 23-084 Winter 2023-2024 Cost of Gas

Department of Energy Data Requests - Set 1 (Supplemental)

Date Request Received: 9/29/23 Request No: DOE 1-18 Date of Response: 10/9/23 Respondent: James King

REQUEST:

Reference: Direct Testimony of D. Gilbertson, R. Garcia, and J. King (Testimony); and Liberty-Keene Winter 2023-2024 COG Model (Keene Model) - Tab "Unaccounted For"

- a. Please provide definition of the following terms: Therm sendout, Therm throughput, Company therm use, Lost and Unaccounted For (LAUF), Variance (ref. Tab "Unaccounted For"); Projected Gas Sales – therms (ref. Bates pg. 020); and Gas Sales – therms.
- b. Please provide a formulaic relationship among these terms (re. Keene Model Tab "Unaccounted For"); please also provide a general formulaic relationship among all terms, if applicable.

RESPONSE:

- a. These terms are defined as follows:
 - "Therm Sendout" is the quantity of therms that are injected into the Company's system for a given month.
 - "Therm Throughput" is the quantity of therms billed to customers for a given month.
 - "Company Use" is the quantity of gas used by the Company in its gas distribution operations.
 - "Variance" is the total difference between Total Sendout and the sum of Therm Throughput and Company Use.
 - "Lost And Unaccounted For (LAUF)" is a percentage equal to the Variance divided by the Therm Sendout.
 - "Projected Gas Sales –therms" (ref. Bates pg. 020) refers to the weather normalized projected gas sales as shown on Schedule J.

Note that the term "Gas Sales –therms" is not used in the referenced testimony or Keene Model.

b. The following calculation uses the 12-month sum of Total Sendout, Total Throughput, Company Use, and Variance.

Variance = Therm Sendout - (Therm Throughput + Company Use) LAUF % = Variance ÷ Therm Sendout