

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

DG 21-008

Petition for Approval of a Firm Transportation Agreement  
with Tennessee Gas Pipeline Company, LLC

Conservation Law Foundation Technical Session Data Requests - Set 1

Date Request Received: 9/13/21  
Request No. CLF TS 1-1

Date of Response: 9/23/21  
Respondent: Francisco C. DaFonte  
Deborah M. Gilbertson

---

**REQUEST:**

As discussed at the September 13, 2021, technical session:

- a. Please produce a side-by-side comparison of the Company's demand forecast based on its econometric model with and without the out of model adjustments for sales and promotional activities.
  - i. Please produce the differences for the demand forecast models by year (through 2038/39) and by customer class.
  - ii. Please provide any formulas and workpapers relied on by the Company to produce the demand forecast model comparisons.

**RESPONSE:**

- a. Please see Attachment CLF TS 1-1.xlsx, which includes the annual Normal Year demand forecast by customer segment. That forecast is then adjusted to remove the out-of-model adjustment related to the existing service territory as requested in this data request. As discussed in the Company's response to CLF 3-2:

The out-of-model adjustment for the existing service territory was required because it represents information that was not embedded in the historical data underlying the econometric models. Stated differently, relying solely on the results from the econometric models would understate the demand forecast based on recent actual Company performance.

Further, as stated on Bates 017 lines 7 through 12 of the DaFonte and Killeen rebuttal testimony:

Furthermore, as shown in Table 1 on page 12 of our direct testimony and updated in the Company's response to PLAN 1-7, the demand forecast (which includes the out-of-model adjustment for the existing service territory) has been somewhat below normalized actual demand (except for

split-year 2019/20, which included the effects of the COVID-19 pandemic). That is, since 2017/18 (the first year of the forecast), the demand forecast has not been out of line with actual demand as Dr. Hill suggests.

- i. Please see Attachment CLF TS 1-1.xlsx.
- ii. Please see Attachment CLF TS 1-1.xlsx.