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February 14, 2020

*Via Hand-Delivery and Electronic Mail*

Debra A. Howland, Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, New Hampshire 03301-2429

**Re: Docket No. DG 18-140; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities**

**Petition for Approval of a Renewable Natural Gas Supply and Transportation Contract**

Dear Ms. Howland:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities, I write to ask that the Commission close the above docket, without prejudice to the Company making a new filing that resolves the procedural concerns raised in Staff's February 7, 2020, recommendation, and that answers the substantive questions raised in Staff's and the OCA's testimony.

Since the last activity in this docket, the Company has been engaged in the following tasks:

- **June 2019:**
  - A third potential commercial customer expresses interest in utilizing RNG to help with their sustainability goals.
  - Negotiations to revise the RNG Supply and Transportation Contract with RUDARPA continue.
- **July 2019:** RUDARPA receives financing approval.
- **August 2019:**
  - NDA signed by third potential customer and talks continue.
  - Northeast Gas Association and GTI release the Interconnect Guide for Renewable Natural Gas (RNG) in New York State, and Liberty adopts the suggested RNG gas quality specifications listed in this guide for all of its natural gas LDC's.
  - Executed the amended RNG Supply and Transportation Contract with RUDARPA.

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- **November 2019:**
  - Executed letter of intent received from third customer.
- **December 2019:**
  - Met with 3Degrees to discuss RNG Opt-in strategies to be available to all customers.
- **January 2020:**
  - Signed NDA from 3Degrees received.
  - RUDARPA receives final air permit from NHDES.
- **February 2020:**
  - Sign contract with 3Degrees to perform a market assessment of EnergyNorth customers for the potential RNG Opt-in Program.

The Company will make a new filing in the coming weeks that will seek approval of an amended RNG Supply Agreement between the Company and RUDARPA. The amended contract insulates customers and the Company from risks arising from the construction, ownership, and operation of the proposed RNG facility. RUDARPA will be responsible to build, own, and operate the facility and to produce RNG that meets strict quality requirements. The amended contract only obligates the Company to buy the conforming RNG when produced.

The filing will propose new tariff language that sets the minimum quality specifications that the RNG must meet before delivery to the Company. These quality specifications have been approved by other commissions and are currently being used by natural gas distribution utilities.

The filing will also include Letters of Intent (LOIs) from three potential commercial customers who have agreed to purchase a majority of the output from the proposed RNG facility at the full contract price, thus protecting non-RNG customers and the Company from the risk that the RNG contract price may be higher than the applicable cost of gas.

Thank you.

Sincerely,



Michael J. Sheehan

cc: Service List