



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

DG 16-812
Winter 2016-2017 Cost of Gas

Staff Data Requests - Set 2

Date Request Received: 10/31/16
Request No. Staff 2-8

Date of Response: 11/15/16
Respondent: Christian Brouillard

REQUEST:

Given the changes and enhancements to the control systems since the 2015 operational event, please explain why Liberty continues to man the plant 7/24.

RESPONSE:

Liberty weighed the operation risks to the reliable and safe operation of the Keene Propane Air Plant. We focused our evaluation specifically on the blower and fuel control system that is necessary to supply an adequate air supply and fuel mixture to the high pressure (3.5 psig) system. While the Company has implemented a broad range of safety and operational enhancements to the system, there remains a residual risk of another incident similar to the incident that occurred on December 19, 2015. We believe this risk to be very small; nonetheless, the Company also believes that it must take whatever steps are reasonably justified to ensure the safety of our customers, employees, and the Keene community. Therefore, the incremental cost to continue 24/7 staffing for the next two to three months is considered to be necessary and justified in order to mitigate the residual safety risks. Further, as a temporary measure to improve safety and reliability, we plan to convert a portion of the high pressure system (Monadnock Marketplace) to CNG. We expect to complete this limited conversion in December/early January at which time the blower system will be placed in cold standby and the plant run on atmospherically supplied air to supply only low pressure system and a small remaining portion of the high pressure system. This is only a temporary measure, specific to the Monadnock Marketplace segment of the high pressure system. The permanent CNG conversion of both the high pressure and low pressure systems is not expected to begin until later in 2017.