

seasonal and peaking gas supply services, daily natural gas trading and asset management. Specifically, with respect to its ability to serve New England gas markets, RENA's affiliate REC has contracted for approximately 1,200,000 dekatherms per day ("Dth/d") of the capacity of the Canaport™ LNG facility at Saint John, New Brunswick, Canada ("Canaport LNG").¹ With REC having a long-term contract in place for 100 percent of this capacity and RENA having a corresponding long-term contract in place for 730,000 Dth/d of firm transportation capacity on Maritimes & Northeast Pipeline, L.L.C. ("Maritimes"), RENA has the ability to supply New England gas markets with substantial volumes of natural gas through deliveries directly off the Maritimes system as well as into the eastern ends of Algonquin Gas Transmission, LLC at Beverly-Salem, MA and Tennessee Gas Pipeline Company, L.L.C. ("Tennessee") at Dracut, MA. RENA has been serving the New England gas market since 2008 and plays a very critical role in supplying the winter peak needs of the region via the fast response and high deliverability capabilities of Canaport LNG.

2. On December 22, 2017 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty") filed a petition ("Liberty's Petition") for approval of certain contractual arrangements and for Commission findings regarding the prudence of proposed investments including an in-state pipeline (the "Granite Bridge Pipeline"), and an on-system liquefied natural gas ("LNG") facility that is capable of delivering 150,000 Dth/d into the Granite Bridge Pipeline.
3. Liberty's Petition states that its estimated projections of customer growth and

¹ Canaport LNG is jointly owned by Repsol Partners (75 percent) and Irving Partners (25 percent).

the limited capacity of Tennessee's Concord Lateral necessitate the contractual arrangements and facility investments contemplated in its filing – otherwise it would have to impose a moratorium on further expansion.²

4. Liberty's Petition also states that it investigated a number of alternatives to its preferred supply strategy which included the evaluation of imported LNG supplies from RENA.³ However, it is unclear from Liberty's petition the basis of that evaluation and the assumptions utilized.
5. RENA appreciates the legitimate concerns Liberty has raised in its petition. Nonetheless, even assuming the customer growth projections included in Liberty's Petition are accepted by the Commission, the new greenfield LNG facility proposed by Liberty would result in natural gas supply capacity significantly in excess of its near- and mid-term natural gas design day needs and could result in customer subsidization of Liberty's LNG investment without any corresponding benefit.
6. RENA respectfully suggests that a winter peaking service more tailored to Liberty's near- and mid-term needs utilizing the existing Canaport LNG facility along with the proposed Granite Bridge Pipeline would better serve Liberty's customers by better matching demand with supply.
7. The Commission's responsibilities in reviewing Liberty's Petition include addressing the question of whether Liberty reasonably investigated and analyzed its long-term supply requirements and the alternatives for satisfying those requirements.

² See Liberty's Petition at page 2.

³ See Pre-filed Direct Testimony of William R. Killeen and James M. Stephens at pages 69-84.

8. As an alternative supplier of natural gas services to Liberty, RENA's rights, duties, privileges, immunities or other substantial interests may be affected by this proceeding and RENA's interest cannot be adequately represented by any other party. As indicated above, the Granite Bridge Project may lead to a significant amount of winter peaking capability above the needs of Liberty. Liberty may be incented to facilitate off-system sales in the region utilizing such excess capacity which would impact RENA's rights, privileges and substantial interests in the market place.
9. RENA has knowledge and expertise in the area of gas transportation and energy markets and can attest to its own costs and ability to enter long-term contracts with distribution companies in the public interest or offer service in competitive markets. RENA's participation in this proceeding will assist the Commission in developing a comprehensive record and in resolving issues in this docket.
10. The interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing this intervention, particularly where the proceeding is just beginning.
11. Accordingly, RENA requests the right to participate in all aspects of this case with full intervenor status, including, as it deems necessary, the right to the presentation of testimony, discovery, cross-examination of witnesses, and the presentation of arguments orally and through briefs.
12. RENA requests that all notices, testimony, pleadings, and correspondence pertaining to these proceeding be directed to:

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WHEREFORE, for the reasons stated above, RENA respectfully requests that the Commission grant this Petition to Intervene.

Respectfully submitted,

Repsol Energy North America Corporation

By: /s/ Jonathan Hoff
Jonathan Hoff

Dated: March 6, 2018

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has on this day been sent via electronic mail to all persons on the Service List in docket No. DG 17-198.

/s/ Jonathan Hoff

Jonathan Hoff

Dated: March 6, 2018