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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: 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, enclosed for filing in the above docket are (a) the *Corrected Testimony of William J. Clark and Mark E. Saltsman*, and (b) the *First Amended RNG Supply and Transportation Agreement* (the "Amended RNG Agreement"), which is attached to the corrected Clark-Saltsman testimony as Attachment WJC/MES-1R. The reasons for these filings are as follows.

The *Corrected Testimony of William J. Clark and Mark E. Saltsman* is intended to remove any statements or suggestions that GTI has established any "specifications" for RNG. As stated in GTI's white paper titled, *Guidance Document for the Introduction of Landfill Derived Renewable Gas into Natural Gas Pipelines* (the "Guidance Document"), which is attached to Kristine Wiley's testimony and appears at Bates 107, the Guidance Document is not intended to establish "specific operational parameters" or "specs" for RNG, but is intended "to provide a framework for productive discussions regarding" RNG.

The guidance document is not prescriptive; it is meant to provide a framework for productive discussions regarding high-BTU landfill-derived renewable gas quality. It is not intended to provide specific operational parameters for such gas. It is expected to serve as an industry-wide reference covering basic high-BTU landfill-derived renewable gas quality and characteristics. This version of the guidance document is revised and edited from prior releases based on new information gained from the additional sampling and analysis work, and the 2009 edition of American Gas Association (AGA) Report 4A.1

While specific gas quality tariffs vary from company to company, many common basic quality parameters exist. The guidance document contains a review of these common gas quality parameters, analytical ranges typical to pipeline tariffs for the parameters, and representative analytical tests. A brief comparison to high-BTU landfill-derived renewable gas data and natural gas data is made. Tables 1A and 1B summarize

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the findings. Other constituents of interest are reviewed based on past historical data and potential impact.

Bates 110.

The original Clark/Saltsman testimony at Bates 009, quoted below, incorrectly includes language that says GTI has established specifications for RNG. The corrected testimony makes edits to cure the error, also shown below.

The contract requires RUDARPA to deliver to EnergyNorth "pipeline quality" RNG from this facility, at the standards that Liberty and RUDARPA developed after review of specified in the Gas Technology Institute (GTI) Guidance Document for the Introduction of Landfill Derived Renewable Natural Gas into Natural Gas Pipelines. Please see the direct testimony of Kristine Wiley, coauthor of the Guidance document, for more on the Guidance Document ~~this topic.~~ The Mminimum specifications that Liberty and RUDARPA agreed upon can also be found in Exhibit B of the contract, Attachment WJC/MES-1.

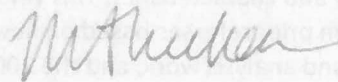
The corrected Clark/Saltsman testimony is now paginated Bates 001R through Bates 018R.

As indicated in the above-quoted section of testimony, the error was also carried into the RNG Agreement through use of the term "GTI Standards," which is defined and used as the specific gas quality specifications that RUDARPA must satisfy. Although Liberty and RUDARPA relied on the Guidance Document as it was intended (as a "framework for productive discussions regarding high – BTU landfill-derived renewable gas quality"), the RNG Agreement should not have labeled the standards that they agreed to meet as "GTI Standards." The Company has worked with RUDARPA to execute the Amended RNG Agreement, which removes the reference to "GTI" and "GTI Standards," and instead uses the term "RNG Standards" which are the standards mutually agreed to by the Company and RUDARPA for the purpose of the original and of the Amended RNG Agreement. No other changes were made to the RNG Agreement.

Note that the Amended RNG Agreement keeps the numerical specifications of Exhibit B because those are the specifications that RUDARPA agreed to meet and are material to the agreement between Liberty and RUDARPA. The Amendment RNG Agreement, since it effectively replaces the original agreement, is labelled Attachment WJC/MES-1R and is paginated Bates 019R through Bates 063R.

Thank you.

Sincerely,



Michael J. Sheehan

Enclosures
cc: Service List