

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-1

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Please provide the Company's historical annual and peak/design day demand by year for all years from 2006 until present.

RESPONSE:

Please see the response to CLF 1-2.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-2

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Please provide the Company’s historic design day and annual degree day *estimates* by year for all years from 2006 until the present. Please compare these *estimates* to *actual* peak day and annual degree day demands and temperatures.

RESPONSE:

Please see the table below for the Design Day demand forecast for EnergyNorth since its 2012 acquisition by Liberty Energy Utilities (New Hampshire) Corp. as compared to the actual peak day demand. In addition, the table below provides the Design Day and Normal Year heating degree days (“HDD”) and the actual peak day and annual HDDs. Please see the Company’s response to OCA 1-8 for the comparison of annual demand.

Split-Year (Nov-Oct)	Forecast				Actual		
	Design Day Demand (Dth)	Design Day HDD	Normal Year HDD	Note	Peak Day Demand (Dth) [3]	Peak Day HDD	Annual HDD
2013/2014	142,542	71	6,297	[1]	134,271	64	6,737
2014/2015	146,630	71	6,297	[1]	137,163	62	6,729
2015/2016	149,433	71	6,297	[1]	139,271	62	5,412
2016/2017	153,799	71	6,297	[1]	123,441	54	5,759
2017/2018	157,848	71	6,325	[2]	148,229	65	6,170
2018/2019	164,571	71	6,325	[2]	151,967	60	6,207
2019/2020	167,643	71	6,325	[2]	126,884	53	5,928
2020/2021	168,942	71	6,325	[2]	132,822	53	N/A

Notes:

[1] Source: 2013/14 -2017/18 Least Cost Integrated Resource Plan, Docket No. DG 13-313

[2] Source: 2017/18 -2021/22 Least Cost Integrated Resource Plan, Docket No. DG 17-198

[3] Peak day volumes are based on total sendout, whereas Design Day demand is based on Planning Load

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-3

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Does “Table 2: Updated Base Case Design Day Resource Shortfall (Dth)” in the Direct Testimony of DaFonte and Killeen (Bates p. 18) reflect any changes in the anticipated annual and peak day demands in future years? Please provide the estimated annual degree days and design day demands for each of the split years provided in Table 2.

RESPONSE:

The “Updated Base Case Design Day Demand” column represents the Company’s forecast of Design Day demand over the forecast period. As discussed on Bates 016 of the Direct Testimony of Messrs. DaFonte and Killeen, the Design Day demand forecast presented in Table 2 is the same demand forecast provided in Docket No. DG 17-198.

The Design Year HDDs in each year of the forecast period was assumed to be 6,869 HDDs. The Design Day demand forecast is provided in the referenced table.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-4

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Do the Company's annual and design day demand forecasts account for and/or factor in the COVID-19 related economic recession/contraction? Has the Company updated/revised its demand forecasts (contained in the Direct Testimony of DaFonte and Killeen) in response to the COVID-19 related economic recession/contraction? If not, why has the Company not revised its demand forecasts in light of the decrease in economic growth experienced due to COVID-19.

RESPONSE:

The Company did not conduct the requested analysis. As stated in the referenced testimony, the Company's objective in this proceeding is to seek approval of the long-term contract for capacity on TGP to provide reliable service in a cost-effective manner to customers that depend on that service during extreme weather events. The provision of that service is based on a capital-intensive infrastructure that is not evaluated on a year-to-year basis, but rather over the long-term planning horizon.

The Company's normalized actual demand since March 2020 (i.e., COVID-19 related) is provided in the response to PLAN 1-7. As shown in that response, normalized actual demand in the 2019/20 split-year was approximately 2.0% below the demand forecast; and normalized actual demand over the most recent period from November 2020 through February 2021 was 2.3% higher than the forecast.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-5

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Has the Company performed any alternative annual or design day demand forecasts from what is included in the DaFonte and Killeen testimony that factor in the COVID-19 related economic recession? If so, please produce those alternative demand forecasts.

RESPONSE:

No. Please see the response to CLF 1-4.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-6

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Does “Figure 1: Updated Base Case Design Day Demand Forecast” in the DaFonte and Killeen testimony (Bates p. 15) reflect savings from increased natural gas energy efficiency as proposed by Liberty in the 2021-2023 NH Saves Triennial Plan? Please provide any workpapers and analyses with formulas intact indicating how the proposed 2021-2023 Triennial program savings are reflected in Figure 1.

RESPONSE:

No. As of the date of this response, the Commission has not issued a decision regarding the 2021–2023 NH Saves Triennial Plan, Docket No. DE 20-092.

As discussed on Bates 016 of the Direct Testimony of Messrs. DaFonte and Killeen, the Company relied on the same demand forecast as provided in Docket No. DG 17-198. As shown in Table 1 of the Direct Testimony of Messrs. DaFonte and Killeen, and updated in the response to PLAN 1-7, the Company’s demand forecast is supported by actual experience.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-7

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Does the same Figure 1 as referenced in CLF 1-6 reflect any initiatives or tariffs focused on reducing peak design day loads, such as curtailable or peak time pricing initiatives? Please provide a description of any peak demand reduction programs or tariffs the Company has in place or has considered offering. If Figure 1 does not reflect such initiatives or tariffs, please explain why they were not considered.

RESPONSE:

No. The Company does not have any demand reduction programs or tariffs in place. The Company is aware of and monitoring at least three gas demand reduction pilots currently being implemented in North America (SoCal Gas, National Grid (NY), and ConEd); all of which have inconclusive results at this point in terms of the ability to produce meaningful reductions in peak gas load.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-8

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Has the Company performed analysis to consider whether increased electrification (*e.g.*, increased use of heat pumps for water and space heating and other electric technologies) would reduce annual or design day natural gas demand? If so, please provide all materials related to these analyses.

RESPONSE:

No. The Company has not performed the requested analysis.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-9

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

The DaFonte and Killeen testimony includes the Company's actual demand data through the winter of 2019/20. If available, please provide the Company's actual demand data for the winter of 2020/21.

RESPONSE:

Please see the response to PLAN 1-7.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-10

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Do the Company's demand forecasts in the DaFonte and Killeen testimony account for any changes in natural gas demand for electric generation through 2038/39? If available, please provide the Company's forecasts for natural gas demand for electric generation over this time-period.

RESPONSE:

The Company does not have any electric generation customers in its planning load nor does it currently expect to add any electric generation customers to its planning load.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-11

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Please refer to the Direct Testimony of DaFonte and Killeen at Bates page 16. Please explain if the Company has updated its demand forecasts and/or regression analyses used to forecast demand with more recent data (July 2020 to date). If so, please provide the updated forecasts and/or regression results and data used in machine readable format with formulae intact.

RESPONSE:

The Company has not performed the requested analysis. Please see the response to CLF 1-4.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-12

Date of Response: 4/23/21
Respondent: Francisco C. DaFonte

REQUEST:

On Bates page 29 of the DaFonte Killeen testimony it states “the on-system distribution facilities associated with the TGP Londonderry Alternative could be phased in over time...” Does the Company agree that the petition in this proceeding only seeks approval of the proposed TGP capacity contract and that the proceedings are not intended to pre-suppose or determine the eventual need for on-system capital investments of \$45 million associated with the TGP Londonderry Alternative route? Also, please clarify that the request to the Commission for approval of the TGP capacity contract does not seek approval of the on-system enhancements in this docket?

RESPONSE:

The Company is not seeking Commission approval for any on-system enhancements associated with the optimization of the TGP contract in this petition.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-13

Date of Response: 4/23/21
Respondent: Francisco C. DaFonte

REQUEST:

Can the proposed TGP capacity contract provide the proposed supply benefits if the on-system enhancements with \$45 million of capital costs are not undertaken?

RESPONSE:

No.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-14

Date of Response: 4/23/21
Respondent: Francisco C. DaFonte

REQUEST:

If the Company considers the potential on-system enhancements associated with the TGP Londonderry Alternative to be required, please explain why the proposed contract and the on-system enhancements are not being presented in a consolidated filing?

RESPONSE:

The Company delineates capacity contracts from infrastructure projects because the costs are recovered in different fashions and are ripe for recovery at different times. Capacity contract costs are recovered through the company's Cost of Gas (COG). Infrastructure costs are recovered through a rate case proceeding or separate cost recovery filing, and are not eligible for recovery until placed in service.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-15

Date of Response: 4/23/21
Respondent: Francisco C. DaFonte

REQUEST:

Has the Company conducted any analysis of the staging and cost recovery for potential on-system enhancements, if at some point in the future, the on-system capital investments associated with the TGP Londonderry Alternative are proposed to the Commission for recovery/approval? Please provide any analysis and workbooks with formulas intact indicating the anticipated timing of possible on-system enhancements, the level of investments, and the proposed amortization period for these investments.

RESPONSE:

Please see the Company's response to Staff 1-5 and OCA 1-14.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-16

Date of Response: 4/23/21
Respondent: Francisco C. DaFonte

REQUEST:

Please describe the locations of the on-system enhancements and other upgrades associated with the TGP Londonderry Alternative identified in the DaFonte and Killeen testimony, by providing the addresses and latitude and longitude coordinates for the route associated with the TGP Londonderry Alternative and including, but not limited to, the following enhancements described on Bates p. 24-26 of the testimony: (1) Candia Road Station; (2) feeder line in Manchester; (3) Granite Ridge Station; (4) Budweiser line in Nashua; (5) Brown Avenue pipeline and regulator in Manchester; and (6) Daniel Webster Highway Merrimack Station in Manchester. Additionally, please provide any maps identifying the route and on-system enhancements included in the TGP Londonderry Alternative.

RESPONSE:

Please see the Company's response to OCA 1-13.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-17

Date of Response: 4/23/21
Respondent: Francisco C. DaFonte

REQUEST:

Please confirm that the Company and TGP do not intend to pursue the TGP Nashua/Manchester Alternative described in the DaFonte and Killeen testimony.

RESPONSE:

Confirmed.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-18

Date of Response: 4/23/21
Respondent: Francisco C. DaFonte

REQUEST:

Please explain whether the on-system enhancements involved with the TGP Londonderry Alternative will occur in any residential neighborhoods and, if so, where.

RESPONSE:

Please see the Company's response to OCA 1-13.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-19

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Has the Company analyzed the costs and/or changes in demand associated with imposing a prohibition on new or expanded use of natural gas in any parts of its existing service territory, which might occur over the next three decades? If so, please provide such analysis and workpapers with formulas intact. If not, why has the Company not considered the alternative of not expanding natural gas use in its territory as a possible solution?

RESPONSE:

No, the Company has not completed any analysis associated with prohibiting the use of natural gas in any parts of its existing service territory over the next three decades.

The Company has not considered the alternative of not expanding natural gas use because it intends to fulfill its obligation to provide service to all customers who request service and who can be safely and economically served.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-20

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Has the Company analyzed the costs and historic record of having propane facilities performing at their design or nameplate vaporization rates? Is there a record of them not performing as designed to help meet peak demands? Are there upgrades and investments in these facilities that can be made to help them perform to design and nameplate ratings? Have such upgrades been considered as options to help meet peak day demands? Please provide any workpapers and analyses with formulas intact.

RESPONSE:

The Company's three propane production facilities directly connected to its distribution system are located in Manchester, Nashua, and Tilton. In total, they have a design, or nameplate, vaporization capacity of approximately 34,600 MMBtu/day and a combined workable storage capacity of approximately 122,590 MMBtu. Historically, the facilities have never reached their nameplate vaporization capacity primarily due to the fact that there is not sufficient natural gas flowing by these propane facilities to provide a proper blending of a propane/air mix with natural gas. The historical peak sendout from the Nashua propane plant was 9,954 Dth which occurred on February 14, 2016. The historical peak sendout from the Manchester propane plant was 9,921 Dth which occurred on February 5, 2007. The historical peak sendout for the Tilton propane plant was 1,242 Dth (the Company does not have the date on which this occurred). While the combined total historical peak vaporization capacity of these facilities was 21,117 Dth, the peak vaporization capacity for each facility occurred on different days. The combined single day peak vaporization from these facilities was 18,869 Dth which occurred on February 5, 2007.

As to whether any upgrades or investments can be made to these propane facilities, the Company recently engaged with a process control engineer to analyze the current operating controls at Manchester and Nashua to see if upgrades would allow for increased vaporization capacity. The process control engineer will take into consideration the adverse impact that propane/air injection has on high efficiency equipment. As noted in prior dockets, the Company is very concerned with customer outages and complaints associated with propane production. Due to the low tolerance of high efficiency equipment to handle the particular characteristics of propane air, customer outages and complaints have been correlated directly to when the Company is utilizing

Docket No. DG 21-008 Request No. CLF 1-20

its propane facilities. As recently as March 15, 2021, the Company received significant customer complaints when it had to utilize its propane facility in Manchester to meet increased demand due to much colder than forecast temperatures.

Given the increased installation of high efficiency equipment and the adverse impact that propane/air blending has on that equipment, it is highly unlikely that the operational capacity of the Company's existing propane facilities will reach, or exceed, historical levels. Rather, it is more likely that the operational capacity of the propane facilities will decrease over time as new high efficiency equipment is added by customers.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-21

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Please identify all current capacity contracts that the Company is currently entered into? For each capacity contract identified, please provide the transporter/provider of gas, length of the contract, capacity amount, and describe any renewal provisions, if applicable.

RESPONSE:

See Attachment CLF 1-21.

LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.

DG 21-008

CLF 1-21

Transportation Agreements Available for Pipeline Supply and Storage (MMBtu)

(as at filing date in April 2021)

SOURCE	RATE SCHEDULE	CONTRACT NUMBER	TYPE	MDQ MMBTU	MAQ * MMBTU	EXPIRATION DATE	NOTIFICATION DATE	RENEWAL OPTIONS
ANE	NA	NA	Supply	4,047	611,097	Peak Only	N/A	Terminates
Constellation	FCS		Firm Combination Liquid and Vapor Svc	Up to 10 trucks	730,000	3/31/2022 Peak Only	N/A	Terminates
Dracut or Z6	NA	NA	Supply	Up to 20,000 / day	1,412,000	2/28/2021	N/A	Terminates
TGP Long-Haul	NA	NA	Supply	21,596	3,908,876	4/30/2021	N/A	Terminates
Northern Transport	NA	NA	Trucking	28,500 Gallons	900,000 Gallons		N/A	
Dominion Transmission Incorporated	GSS	300076	Storage	934	102,700	3/31/2024	3/31/2022	Mutually agreed upon
Honeoye Storage Corporation	SS-NY	11234	Storage	1,957	245,380	3/31/2023	12 months notice	Evergreen Provision
National Fuel Gas Supply Corporation	FSS	O02358	Storage	6,098	670,800	3/31/2023	3/31/2022	Evergreen Provision
National Fuel Gas Supply Corporation	FSST	N02358	Transportation	6,098	670,800	3/31/2023	3/31/2022	Evergreen Provision
Iroquois Gas Transmission System	RTS	47001	Transportation	4,047	1,477,155	11/1/2022	11/1/2021	Evergreen Provision
Portland Natural Gas Transmission System	FT	208544	Transportation	1,000	365,000	11/30/2032	11/31/2031	Evergreen Provision
Portland Natural Gas Transmission System	FT**	PXP - 233320	Transportation	5,000	1,825,000	10/31/2040	10/31/2039	Precedent Agreement
Tennessee Gas Pipeline Company	FS-MA	523	Storage	21,844	1,560,391	10/31/2025	10/31/2024	Evergreen Provision
Tennessee Gas Pipeline Company	FTA	8587	Transportation	25,407	9,273,555	10/31/2025	10/31/2024	Evergreen Provision
Tennessee Gas Pipeline Company	FTA	2302	Transportation	3,122	1,139,530	10/31/2025	10/31/2024	Evergreen Provision
Tennessee Gas Pipeline Company	FTA	632	Transportation	15,265	5,571,725	10/31/2025	10/31/2024	Evergreen Provision
Tennessee Gas Pipeline Company	FTA	11234	Transportation	9,039	3,299,235	10/31/2025	10/31/2024	Evergreen Provision
Tennessee Gas Pipeline Company	FTA**	72694	Transportation	30,000	10,950,000	10/31/2029	10/31/2028	Evergreen Provision
Tennessee Gas Pipeline Company	FTA	95346	Transportation	4,000	1,460,000	11/30/2022	11/30/2021	Evergreen Provision
Tennessee Gas Pipeline Company	FTA	42076	Transportation	20,000	7,300,000	10/31/2025	10/31/2024	Evergreen Provision
TC Energy	FT	41232	Transportation	4,047	1,477,155	10/31/2026	10/31/2024	Evergreen Provision
TC Energy	FT	PXP - 60658	Transportation	5,009	1,825,000	10/31/2040	10/31/2038	Precedent Agreement
Enbridge Gas Inc.	M12	M12200	Transportation	4,092	1,493,580	10/31/2023	10/31/2021	Evergreen Provision
Enbridge Gas Inc.	M12	PXP - 12284	Transportation	5,069	1,825,000	10/31/2040	10/31/2038	Precedent Agreement

No Expiration Date

* MAQ is calculated on a 365 day calendar year.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-22

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Please explain whether the Company and/or TGP attempted to negotiate or considered the possibility of negotiating a smaller quantity of natural gas or shorter-term length for the TGP capacity contract? If not, please explain why the Company did not seek to negotiate a smaller quantity or term length for the capacity contract.

RESPONSE:

Please see the Company's response to OCA 1-4.

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 Data Requests - Set 1

Date Request Received: 4/9/21
Request No. CLF 1-23

Date of Response: 4/23/21
Respondent: William R. Killeen

REQUEST:

Has the Company considered the potential environmental and public health impacts—including impacts from climate change—of the 40,000 Dth/day TGP capacity contract, for which Liberty seeks approval in this docket? Please provide any analysis and workpapers with formulas intact, with estimates of annual carbon dioxide equivalent emissions from the end use customers combustion of Liberty Gas natural gas supplies, with and without the proposed TGP capacity contract. Also provide an estimate of the fugitive emissions and global warming potential (GWP) equivalent emissions with and without the proposed TGP capacity contract. If the environmental impacts of the proposed TGP capacity contract have not been estimated or analyzed please explain why this analysis has not been undertaken.

RESPONSE:

The Company has not performed any such analysis posed in the query. The Company's contract with TGP uses existing TGP capacity. As such, whether the Company contracted for the capacity or not, the environmental impacts would be the same since an entity(ies) other than EnergyNorth would be utilizing this capacity that has existed for 20 years.