

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

OCA Data Requests - Set 1

Date Request Received: 4/8/21
Request No. OCA 1-14

Date of Response: 4/22/21
Respondent: Francisco C. DaFonte

REQUEST:

Refer Testimony of Francisco C. DaFonte and William R. Killeen, Bates page 26, line 11 to Bates page 27, line 5.

- a. Please explain how the levelized annual costs are calculated.
- b. Please provide the live excel models associated with the calculations of the levelized annual costs

RESPONSE:

- a. The levelized annual costs were calculated by ScottMadden, Inc. using their proprietary levelized rate model. The model requires many inputs including depreciation expense, O&M expense, rate of return, taxes, etc.
- b. The proprietary model is provided as Confidential Attachment OCA 1-14.b.xlsm.

Confidential Attachment OCA 1-14.b.xlsm contains proprietary information of the Company's consultant, ScottMadden, Inc. Specifically, ScottMadden has developed and refined the model over a number of years for work with its clients. ScottMadden's competitive position would be harmed if other firms had unrestricted access to these files. Therefore, pursuant to Puc 203.08(d), the Company has a good faith basis to seek confidential treatment of this information and will submit a motion seeking confidential treatment prior to the final hearing in this docket. Confidential Attachment OCA 1-14.b.xlsm is being provided in electronic working spreadsheet (Microsoft Excel) format. Redacted versions will not be provided.