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

DG 24-100
Winter 2024 - 2025 Cost of Gas

Department of Energy Data Requests - Set 1 (COG)

Subject: Keene 2024-2025 COG
Date Request Received: 9/13/24 | Date of Response: 9/23/24
Request No: DOE 1-2 | Respondent: Adam Yusuf

REFERENCE:

Testimony of at Bates p. 0012 and tab "Unaccounted For" in submitted Live Excel file (that provides the underlying calculations showing the unaccounted-for volumes of gas and the referenced 2.37% LAUF).

REQUEST:

Please separate the amounts of unaccounted gas for CNG and air propane. Please provide these calculations in a Live Excel format.

RESPONSE:

The Company is still working on providing the LAUF broken out by CNG and propane and cannot provide separate LAUFs at this time. The Company hopes to be able to do so by the summer COG filing.

REDACTED

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

DG 24-100
Winter 2024 - 2025 Cost of Gas

Department of Energy Data Requests - Set 1 (COG)

Subject: Keene 2024-2025 COG
Date Request Received: 9/13/24 Date of Response: 9/23/24
Request No: DOE 1-1 Respondent: Sarah Grant

REFERENCE:

Testimony at Bates p. 0017 and 0018.

REQUEST:

a) Please provide details on Xpress Natural Gas LLC (XNG) CNG contract that will go into effect on July 1, 2025.

b) Please provide a comparison between the existing CNG contract and the proposed contract that will start July 1, 2025 CNG contract to Xpress Natural Gas LLC (XNG). Can you please clarify whether the contract set to take effect July 1, 2025 has been executed by the parties.

RESPONSE:

a) The XNG contract that will go into effect on July 1, 2025 has a demand fee of [redacted] annually. The price of the commodity is as follows:
   i. Service adder is [redacted] per MMBtu
   ii. Marketer Basis Charge for [redacted] per MMBtu and if choosing [redacted], the Marketer Basis Charges is [redacted] per MMBtu.

b) The XNG contract that will go into effect July 1, 2025 has been executed by both parties. Comparatively, the existing contract has a demand fee of [redacted] annually; the next contract has a demand fee of [redacted] annually. The price of the commodity will change as follows:
   i. Service adder changes from [redacted] to [redacted] per MMBtu
   ii. Marketer Basis Charge for [redacted] changes from [redacted] per MMBtu to [redacted] per MMBtu, and if choosing [redacted], the Marketer Basis Charges changes from [redacted] per MMBtu to [redacted] per MMBtu.

The shaded or redacted information above includes pricing and other information that is “confidential, commercial, or financial information” and is thus protected from disclosure by RSA 91-A:5, IV, and presumed to be confidential in cost of gas proceedings pursuant to Puc 201.06(a)(11). Therefore, pursuant to that statute and Puc 203.08(d) and Puc 201.01.06(a)(11)(g) (protecting "responses to data requests related to a. through f. above"), the Company has a good faith basis to seek confidential treatment of this information and asserts confidentiality pursuant to those rules.

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

DG 24-100
Winter 2024-2025 (Keene) COG

Department of Energy Data Requests - Set 2 (COG)

Subject: Keene 2024-2025 COG
Date Request Received: 10/1/24 Date of Response: 10/8/24
Request No: DOE 2-2 Respondent: Sarah Grant

Reference: Testimony at Bates p. 0026 (Schedule E)

REQUEST:

It has come to the department's attention that the Company has changed their propane transportation from Mt. Belvieu, TX to Selkirk, NY via pipeline to transportation from Mt. Belvieu, TX to Bellows Falls, VT via railroad transportation. Please provide the following information in relation to this change in transportation of propane.

a. Compare the transportation rates via pipeline for the last three years and the current COG, which includes transportation rates via railroad focusing on the overall impact on COG for the shift in means of transportation from pipeline to rail.

b. Did the Company complete an analysis of the impact of shifting from pipeline to railroad and how it may impact terms, rates, and service. If so, please provide it. If not, what factors went into the decision to switch to the rail transportation of propane?

c. Did the Company utilize an RFP to capture bids for transportation. If so, please provide a copy of the Company issued RFP and a comparison of the responses to the RFP in a table including all factors identified in the Company issued RFP. If not, how did the Company decide which transportation mechanism would best serve the needs of the Company and rate payers?

RESPONSE:

a. The Company "changed" its supplier because this particular supplier could deliver the propane to Keene at a lower overall cost than any other supplier who responded to the RFP for the upcoming season. The Company is agnostic as to whether the supplier uses rail or pipeline. Thus, the overall impact of the "shift" to railroad transportation is a lower cost of gas than if the Company had selected the supplier that used pipelines. Please see Attachment 24-100 DOE 2-2a.xlsx

b. Liberty did not complete an analysis of a change from pipe to railroad. Rather Liberty analyzed all bids in which the type of transportation was not known at the time. Liberty did not decide to switch from pipe to rail but rather selected a winning supplier who decided it was in their best interest to supply the Company via railroad.

c. The Company utilized an RFP to capture bids for (1) Delivered propane service to Keene and (2) Transportation of propane from Amherst to Keene. Please see Attachment 24-100 DOE 2-2c-1 for the RFP. Please see Confidential Attachment 24-100 DOE 2-2c-2.xlsx for the RFP Analysis of all bids. Please note Liberty was not made aware of how the propane would be transported as the RFP does not request how propane will be transported. The discovery that the propane will be transported by rail came at a later time. Therefore, the filing was updated to reflect this change. The Company does not decide how the propane will be transported.

Confidential Attachment 24-100 DOE 2-2c-2.xlsx contains pricing and other information that is “confidential, commercial, or financial information” and is thus protected from disclosure by RSA 91-A:5, IV, and presumed to be confidential in cost of gas proceedings pursuant to Puc 201.06(a)(11). Therefore, pursuant to that statute and Puc 203.08(d) and Puc 201.01.06(a)(11)(g) (protecting “responses to data requests related to a. through f. above”), the Company has a good faith basis to seek confidential treatment of this information and asserts confidentiality pursuant to those rules.

Date	Pipeline	Broker	Perc	Supplier	Trucking	Total
2021/2022	0.2396	0.0100	0.0050	0.0500	0.0906	0.40
2022/2023	0.2579	0.0100	0.0050	0.0500	0.1125	0.44
2023/2024	0.2921	0.0125	0.0050	0.0400	0.1236	0.47
2024/2025	0.2959	0.0100	0.0050	0.0278	0.0480	0.39

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

DG 24-098
Winter 2024-2025 and Summer 2025 Cost of Gas and LDAC Filing

Department of Energy Data Requests - Set 1 (COG)

Subject: ENNG 2024-2025 COG
Date Request Received: 9/10/24 Date of Response: 9/18/24
Request No: DOE 1-11 (COG) Respondent: Alyssa Maston

REFERENCE:

Liberty's September 3, 2024 COG filing; RSA 362-I:2 (Supp 2022)

REQUEST:

Please provide a copy of all fixed-price-offer (FPO) letters (for both the EnergyNorth and for the Liberty-Keene division) sent (or that will be sent) to customers to alert them to Liberty's FPO offer. If the Company's letters do not identify a 'start' and 'end' date within which time a customer may elect FPO rates, please identify those periods. If the ENNE and/or Liberty-Keene letters are not final, please provide a current draft.

a) Please provide information on what percentage of customers accepted the FPO offer in the 2023-2024 (Winter), 2022-2023 (Winter) and 2021-2022 (Winter) seasons.

b) How many customers have already accepted the Company's FPO offer for the Winter 2024-25, to date, for EnergyNorth and Liberty-Keene respectively?

c) Liberty has identified a 'Fixed Price Option Administrative Costs' of $62,993. Please provide a break-down of this cost. See R. Garcia and A. Maston Testimony at 011

RESPONSE:

A copy of the FPO letter that will be sent to ENNG customers was provided as Attachment 1 in the Company's filing made into DG 24-098 on September 3, 2024, which includes an enrollment deadline of October 22, 2024. A copy of the FPO letter that will be sent to Keene customers was provided as Attachment 2 in the Company's filing made into DG 24-100 on September 9, 2024, which includes an enrollment deadline of October 19, 2024. At the time this response was prepared, these letters have not yet been sent to customers, but are in the process of being mailed and should reach customers within the coming week.

a) In the 2021-2022 Winter season, 9,657 customers, or 10.1% of ENNG customers accepted the FPO offer. For the same period, 128 customers, or 10.6% of Keene customers accepted the FPO offer.

In the 2022-2023 Winter season, 13,984 customers, or 14.3% of ENNG customers accepted the FPO offer. For the same period, 193 customers, or 16.4% of Keene customers accepted the FPO offer.

In the 2023-2024 Winter season, 13,002 customers, or 13.5% of ENNG customers accepted the FPO offer. For the same period, 99 customers, or 7.5% of Keene customers accepted the FPO offer.

b) At the time this response was prepared, the FPO offer letters for the Winter 2024-25 season had not yet reached customers, so no customers have enrolled in the program

c) The $62,993 included in the winter Cost of Gas for Fixed Price Option Administrative Costs was equal to the actual FPO costs incurred for the last winter season. The FPO offer letters for the Winter 2023-24 were sent through Kubra, which is the mailing vendor that also sends out other types of mailings for the Company each month. The Company only receives one monthly invoice from Kubra and had to recalculate the portion of the monthly invoice from September 2023 that was attributable to the FPO mailings. See Attachment 24-098 DOE 1-11 (COG).xlsx for this calculation.