

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Docket No. DG 24-100

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty–Keene Division
Winter 2024/2025 Cost of Gas

UPDATED DIRECT TESTIMONY

OF

SARAH B. GRANT,

ROBERT GARCIA,

AND

ADAM R.M. YUSUF

September 27, 2024



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1 **I. INTRODUCTION**

2 **Q. Please state your full name, business address, and position.**

3 A. (SG) My name is Sarah B. Grant. My business address is 15 Buttrick Road,
4 Londonderry, New Hampshire. My title is Supervisor, Gas Supply, Energy Procurement.

5 (RG) My name is Robert Garcia. My business address is 15 Buttrick Road, Londonderry,
6 New Hampshire. My title is Manager, Rates and Regulatory Affairs.

7 (AY) My name is Adam R.M. Yusuf. My business address is 15 Buttrick Road,
8 Londonderry, New Hampshire. My title is Analyst I, Rates and Regulatory Affairs.

9 **Q. By whom are you employed?**

10 A. We are employed by Liberty Utilities Service Corp. (“LUSC”). LUSC provides local
11 utility management, shared services, and support to Liberty Utilities (EnergyNorth
12 Natural Gas) Corp. d/b/a Liberty (“Liberty” or “the Company”) and its regulated water,
13 wastewater, natural gas, and electric utility affiliates.

14 **Q. On whose behalf are you testifying?**

15 A. We are testifying on behalf of Liberty’s Keene Division.

16 **Q. Ms. Grant, would you describe your educational background, and your business
17 and professional experience?**

18 A. I graduated from Southern New Hampshire University with a Bachelor of Science in
19 Business Administration and a concentration in Human Resources. In 2013, I was hired
20 by LUSC where I was employed as a Dispatcher. In 2014, I was promoted to Natural Gas

1 Scheduler. In 2016, I was promoted to Senior, Natural Gas Scheduler. In 2023, I was
2 promoted to Supervisor, Gas Supply of Energy Procurement. In this capacity, I provide
3 gas procurement services to Liberty.

4 **Q. Have you previously testified in regulatory proceedings before the New Hampshire**
5 **Public Utilities Commission (the “Commission”)?**

6 A. No, I have not.

7 **Q. Mr. Garcia, would you describe your educational background, and your business**
8 **and professional experience?**

9 A. I have an Artium Baccalaureus (Bachelor of Arts) degree in Political Science and French
10 from Wabash College (Crawfordsville, Indiana) and a Master of Public Administration
11 degree from the School of Public and Environmental Affairs at Indiana University
12 (Bloomington, Indiana) with concentrations in Policy (Quantitative) Analysis and
13 International Affairs. I also obtained a Certificat De Langue Et Civilisation Française
14 from the Université de Paris – Sorbonne (Paris, France) and, as part of my graduate
15 studies, studied French and European government at the École Nationale
16 D’Administration (Paris, France).

17 I was employed by ComEd from April 2001 to March 2023. I began my employment
18 with ComEd in the Regulatory Department as a Regulatory Specialist and moved on to
19 the positions of Senior Regulatory Specialist in 2004, Manager of Regulatory Strategies
20 and Solutions in 2008, and Director of Regulatory Strategy and Services in 2013 before
21 assuming my last position as Director of Regulatory Innovation & Initiatives in 2021.

1 Prior to joining ComEd, I worked for nearly nine years at the Illinois Commerce
2 Commission, beginning in 1992 as an intern in what was then the Office of Policy and
3 Planning and ending in 2001 as the senior policy advisor to a Commissioner. I initially
4 joined the Commission Staff through the James H. Dunn Memorial Fellowship program,
5 a one-year program sponsored by the Office of the Governor. Through this Fellowship, I
6 also held short-term positions in the Bureau of the Budget and the Governor’s Legislative
7 Office.

8 **Q. Please describe your duties at LUSC.**

9 A. As Manager of Rates and Regulatory Affairs, I am primarily responsible for rate
10 administration and regulatory affairs for Liberty EnergyNorth and Liberty Utilities
11 (Granite State Electric) Corp.

12 **Q. Mr. Garcia, have you previously testified in regulatory proceedings before the New
13 Hampshire Public Utilities Commission (the “Commission”)?**

14 A. Yes.

15 **Q. Mr. Yusuf, would you describe your educational background, and your business
16 and professional experience?**

17 A. I graduated from the University of New Hampshire, Durham, in 2009 with a Bachelor of
18 Science in Psychology with a minor in Kinesiology: Sports Studies. I received an
19 Associate degree in Human Services from New Hampshire Technical Institute in
20 Concord, in 2014. I received a Master of Business Administration from Southern New
21 Hampshire University in 2022. I joined Liberty in April 2019, where I held positions as a

1 Customer Service Representative and Billing Representative before joining the Rates and
2 Regulatory Affairs Department.

3 **Q. Have you previously testified in regulatory proceedings before the Commission?**

4 A. Yes.

5 **Q. What is the purpose of your updated testimony?**

6 A. The purpose of our testimony is to present for Commission approval the Company's
7 proposed cost of gas rates for its Keene Division for the 2024/2025 winter (peak) period
8 to be effective beginning on November 1, 2024. Pursuant to the Guidelines adopted for
9 these proceedings in Docket No. DG 23-027, this update to the testimony filed on
10 September 9, 2024 reflects updated base use calculation and interest rate assumptions,
11 which on net had a de minimis impact on proposed rates, and Liberty included additional
12 details regarding recent contracts entered into and Requests for Proposals issued. In
13 addition, Liberty seeks approval to modify the letter informing customers of the Fixed
14 Price Option ("FPO") for use next year (2025/2026 winter period) in order to mitigate the
15 issues that arise when the approved FPO rate varies substantially from the FPO rate
16 initially communicated to customers, which has occurred in recent years. Per the
17 guidelines adopted in Docket No. 23-027, Liberty believes approval of this new letter and
18 any other issues that may be raised concerning the FPO may be "carved out" and
19 addressed in a separate phase of this proceeding, as a decision is not needed before
20 November 1, 2024.

1 **Q. Can you summarize the proposed rates?**

2 A. The table below provides a summary of all rates proposed in this testimony, along with
3 comparisons to the rates approved for the 2023/2024 winter period.

	Rates Effective November 1, 2023 (Second Revised Order No. 26,900)	November 1, 2024, Proposed Rate	Change	% Change
Residential	\$1.4007	\$1.5420	\$0.1413	10%
Residential (GAP)	\$0.7704	\$0.8481	\$0.0777	10%
C&I – LLF (High winter use)	\$1.4007	\$1.5420	\$0.1413	10%
C&I – HLF (Low winter use)	\$1.4007	\$1.5420	\$0.1413	10%
Residential FPO	\$1.4207	\$1.5620	\$0.1413	10%
Residential FPO (GAP)	\$0.7814	\$0.8591	\$0.0777	10%
C&I FPO	\$1.4207	\$1.5620	\$0.1413	10%

5

6 **Q. Are there any schedules and attachments included in your testimony?**

7 A. Yes. The table below lists the schedules and attachment included in our testimony.

Schedule	Description
Summary	Calculation of Cost of Gas Rate – Summary
Schedule A	Conversion of Gas Costs – Gallons to Therms
Schedule B	Calculation of Cost of Gas Rate
Schedule C	Calculation of Purchase Gas Costs
Schedule D	Propane Purchase Stabilization Program
Schedule E	Propane Spot Market Purchase Cost Analysis
Schedule F	Inventory & WACOG Calculation
Schedule I	Weather Normalization – Sendout
Schedule J	Weather Normalization – Sales
Schedule K-1	Bill Impact Analysis: Residential Non-FPO
Schedule K-2	Bill Impact Analysis: Residential FPO

Schedule L-1	Bill Impact Analysis: Commercial Non-FPO
Schedule L-2	Bill Impact Analysis: Commercial FPO
Schedule M	Projected Incremental Cost Calculation Winter 2024-2025
Schedule N	50 Percent of Incremental CNG Costs Winter 2019-2024
Appendix 1	Mont Belvieu Propane Futures Prices
Appendix 2	Enterprise TE Products Pipeline FERC Tariff – Eff. 7/1/2024
Appendix 3A	Trucking Fuel Surcharge Notification
Appendix 3B	Trucking Fuel Surcharge Rate per Gallon
Attachment 1	Illustrative Clean and Redlined Tariff Pages
Attachment 2	2024 FPO Letter
Attachment 3	Proposed FPO Letter (2025/2026 and beyond)

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2 **II. WINTER 2023/2024 COST OF GAS FACTOR**

3 **Q. What is the firm winter cost of gas rate?**

4 A. The cost of gas factor allows the Company to adjust its rates for firm gas sales in order to
5 recover the cost of gas purchased or produced. The winter period cost of gas rates
6 calculated in this filing are to be in effect for the winter heating period, defined as the
7 period from November 1 through April 30. The terms and conditions for the Keene
8 Division cost of gas clause are explained in the Company Tariff No. 11 on pages 32 and
9 33.

10 **Q. What is the proposed firm winter cost of gas rate?**

11 A. The Company proposes a firm cost of gas rate of \$1.5420 per therm for the Keene
12 Division as shown on Illustrative Seventeenth Revised Page 97 of Attachment 1.

13 **Q. Please explain the calculation of the cost of gas rates on Illustrative Seventeenth
14 Revised Page 97 of the tariff.**

15 A. Illustrative Seventeenth Revised Page 97 contains the calculation of the 2024/2025
16 Winter Period cost of gas (“COG”) rate and summarizes the Company's forecast of

1 propane and compressed natural gas (“CNG”) sales and propane and CNG costs. The
2 product of these forecasts results in a total estimated cost of the gas sendout from
3 November 1, 2024, through April 30, 2025, including Indirect Costs from DG 20-105,
4 Return on Inventory, and Interest, of \$1,796,383.

5 To derive the Total Anticipated Cost of Gas, which is used to calculate the COG, the
6 following adjustments are made to the estimated cost of gas sendout:

- 7 1) The prior period under-collection of (\$82,846) is added from the anticipated cost
8 of gas sendout; and
- 9 2) Interest of (\$3,272) is added to the anticipated cost of gas sendout for the period
10 of May 2024 through October 2024. Interest is accrued using the monthly prime
11 lending rate as reported by the Federal Reserve Statistical Release of Selected
12 Interest Rates.

13 The Company calculates the Non-Fixed Price Option (“Non-FPO”) cost of gas rate of
14 \$1.5420 per therm by dividing the Total Anticipated Cost of Gas of \$1,710,266 by the
15 Projected Gas Sales of 1,109,098 therms. The Fixed Price Option (“FPO”) rate of
16 \$1.5620 per therm was established by adding a \$0.02 per therm premium to the Non-FPO
17 rate. The information presented on this tariff page is supported by Schedules A through
18 J, which are described later in this testimony.

19 **Q. Please describe Schedule A.**

20 A. Schedule A converts the gas volumes and unit costs from gallons to therms which is used
21 in Schedule F, inventory & weighted average cost calculation. The 1,193,051 therms

1 represent sendout as detailed on Schedule B, line 3 and line 11. The blended unit cost of
2 those supplies is \$1.2848 per therm which represents the weighted average cost per therm
3 for the winter period gas sendout as detailed on Schedule F, line 39.

4 **Q. What is Schedule B?**

5 A. Schedule B presents the anticipated (over)/under collection calculation for the winter
6 2024/2025 period based on the prior period (over)/under collection, forecasted volumes,
7 the cost of gas, and applicable interest amounts. The schedule begins with the ending
8 balance from the prior winter period and includes the months of May through October
9 2024 to reflect costs related to the winter period. These out of period adjustments can be
10 seen in columns 2 through 7. The forecasted total propane sendout on line 3, plus total
11 CNG sendout on line 11, equals the weather-normalized 2024/2025 winter period firm
12 sendout and company use. The forecasted Firm Sales on line 32 represent weather-
13 normalized 2024/2025 winter period firm sales. The weather normalization calculations
14 for sendout and sales are found in Schedules I and J, respectively.

15 **Q. Are CNG demand charges included in this filing?**

16 A. Yes, CNG demand charges are included in Schedule B on line 14.

17 Schedule B, line 14, includes 75% of the 2024/2025 demand charges. These charges are
18 [REDACTED] per month or [REDACTED] for the year and represent the portion attributable to the
19 winter period.

1 **Q. Are incremental costs for prior winter periods related to the use of CNG (instead of**
2 **propane) included in this filing?**

3 A. Yes. The Winter period 2023/2024 incremental costs are accounted for in the
4 reconciliation of the winter period and included in the (\$50,221) accounting adjustment
5 made in July 2024 on line 18. The actual winter period 2023/2024 experience resulted in
6 CNG savings because propane costs were incrementally greater by \$26,451. Per Section
7 7.1 of the Settlement Agreement in Docket No. DG 20-105, the Company included a
8 charge of the full \$26,451 as the Company is allowed to “recover and retain the full
9 amount of the incrementally lower CNG supply cost up to the amount of incrementally
10 higher CNG costs accrued since the commencement of CNG service, which have not
11 been recovered from customers”. The calculation can be found on Schedule N.

12 **Q. What projected incremental costs are included in this filing?**

13 A. The projected net incremental costs included in this filing reflect a refund of \$17,768,
14 based on a projected incremental CNG cost of \$35,537, of which the Company is allowed
15 to recover one-half. The projected CNG incremental costs are calculated on Schedule M
16 for use on Schedule B, line 15.

17 **Q. Are the concerns raised in Docket No. DG 24-042 regarding Section 7.1 of the**
18 **Settlement Agreement applicable in this proceeding?**

19 A. No. Unlike the incremental amounts deferred for recovery during summer periods, there
20 remains incremental CNG cost deferred for recovery in subsequent periods, as shown on
21 Schedule N. Therefore, the terms of Section 7.1 remain applicable. At issue in Liberty’s

1 testimony in Docket DG No. 24-042 was how to apply these settlement terms once all
2 deferred CNG costs had been recovered.

3 **Q. Are unaccounted-for gas volumes included in the filing?**

4 A. Yes. Unaccounted-for gas is included in the firm sendout on Schedule B, lines 3 and 11.
5 The Company actively monitors its level of unaccounted-for volumes, which amounted to
6 2.37% for the twelve months ended June 30, 2024.

7 **Q. Please describe Schedules C, D, and E.**

8 A. Schedule C presents the calculation of the total forecasted cost of gas purchases in the
9 2024/2025 winter period, segregated by Propane Purchasing Stabilization Plan (“PPSP”)
10 purchases, available storage deliveries from Liberty’s Amherst facility, CNG deliveries,
11 and spot purchases.

12 Schedule D presents the structure of PPSP pre-purchases for the winter period, monthly
13 average rates for the pre-purchases, and the resulting weighted average contract price for
14 the winter period as used in Schedule C, line 5.

15 Schedule E presents the forecasted market spot prices of propane. Line 1 of the Schedule
16 represents the Mont Belvieu propane futures quotations as of September 20, 2024,
17 followed by projected broker fees, pipeline fees, PERC fees, supplier charges, and
18 trucking charges. Together, the pricing and fees make up the expected cost of spot
19 propane purchases as represented in Schedule C, line 31. The Company has entered into a
20 fixed basis contract for spot propane with Raye Energy, the the costs of which have been
21 included on Schedule E.

1 **Q. Has the Company issued a Request for Proposals (“RFP”) to potential suppliers for**
2 **the 2024-2025 Plan?**

3 A. Yes. The Company issued the RFP for the 2024–2025 Plan on May 14, 2024. The RFP
4 was sent to eighteen suppliers. Ray Energy had the least cost bid in which those costs are
5 reflected in Schedule E.

6 **Q. Please describe the Propane Purchasing Stabilization Plan (“PPSP”).**

7 A. The PPSP, as approved in Order No. 24,617 (Apr. 28, 2006) in Docket No. DG 06-037,
8 was again implemented for the winter of 2024/2025. As shown on Schedule D, the
9 Company pre-purchased 700,000 gallons of propane between April and September at a
10 weighted average price of \$1.1750 per gallon (\$1.2841 per therm), inclusive of broker,
11 pipeline, Propane Education & Research Council (“PERC”), and trucking charges in
12 effect at the time of the supplier’s bid.

13 **Q. Have the pre-purchased volumes in the PPSP changed since 2023/2024?**

14 A. The total volume remains at 700,000 gallons or 640,500 therms; however, the monthly
15 volume has been levelized since the 2023/2024 Winter filing. The Keene Division
16 maintains a pre-purchase hedge of approximately 61%.

17 **Q. How was the cost of CNG purchases determined?**

18 A. The CNG costs are shown in Schedule C, lines 20 through 26. These costs reflect the
19 contractual agreement between the Company and its supplier, Xpress Natural Gas, LLC.

1 **Q. Please describe Schedule F.**

2 A. Schedule F contains the calculation of the weighted average cost of inventory for each
3 month through April 2025. The unit cost of projected gas to be sent out each month
4 utilizes this weighted average inventory cost, which is inclusive of all PPSP purchases,
5 spot purchases, Amherst storage withdrawals, and CNG deliveries. Note that the CNG
6 deliveries are shown in separate columns from the propane-weighted cost but are
7 included in the average winter rate, which is established on line 39 of Schedule F. This
8 mix of supply purchases is also itemized on Schedule C.

9 **III. FIXED PRICE OPTION PROGRAM**

10 **Q. Please describe the FPO program that will be in place for the winter period.**

11 A. The Company will offer the FPO program for the upcoming winter period to provide
12 customers the opportunity to lock in their cost of gas rate. Enrollment in the program is
13 limited to 50% of forecasted winter sales, with allotments made available to both
14 residential and commercial customers on a first-come, first-served basis. The Company
15 is forecasting that 11.77% of total sales volumes will enroll in the FPO program. The
16 11.77% is the five-year average FPO participation rate from winter 2018/2019 through
17 the winter of 2022/2023.

18 **Q. Will a premium be applied to the FPO rate?**

19 A. Yes. As approved in Order No. 24,516 (Sept. 19, 2005) in Docket No. DG 05-144, the
20 Company has added a \$0.02 per therm premium to the \$1.5420 per therm Non-FPO cost
21 of gas rate, to derive the FPO rate of \$1.5620 per therm.

1 **Q. Has the Company provided a copy of the letter that it intends to send customers**
2 **informing them of the FPO option for the 2024/2025 winter period?**

3 A. Yes. As agreed during the October 19, 2023, hearings in Docket Nos. DG 23-076 and
4 DG 23-084, a copy of the letter is provided in Attachment 2. It is essentially the same
5 letter as provided in those cases last year, but with updated rates and a little more
6 emphasis of the fact that the proposed FPO rate shown is not guaranteed to be the rate
7 that will be charged until approved by the Commission. Please note that Attachment 2
8 has not been updated as part of this filing and includes the same the letter with the same
9 rate proposed in Liberty’s September 9, 2024 filing.

10 **Q. Does the Company propose any modifications to the FPO letter for use in future**
11 **winter period mailings?**

12 A. Yes. In light of circumstances that caused Liberty to substantially alter its proposed Non-
13 FPO and FPO rates after the letters were sent to customers in recent years (*e.g.*, dramatic
14 increase in gas prices precipitated by the invasion of Ukraine and a booking error
15 discovered shortly before last year’s hearing) resulting in the need to send a second set of
16 FPO letters with updated FPO rates, Liberty seeks approval to use the draft letter set forth
17 in Attachment 3 beginning next year, for the winter period 2025/2026 FPO mailing. The
18 key change is that the proposed letter does not include the FPO rate proposed at the time
19 of the mailing. Rather it simply states that the FPO rate will be 2 cents higher than the
20 approved COG rate, thereby emphasizing the 2-cent per them premium that participating
21 customers will pay for the six-months of price certainty. If this change is approved for
22 the 2025-2026 winter, then in advance of the winter 2026-2027 filing, Liberty will review

1 its findings (*e.g.*, impact on enrollments, customer inquiries) with the Department of
2 Energy and Office of the Consumer Advocate and determine whether to continue using
3 the revised letter.

4 Per the guidelines adopted in Docket No. 23-027, the Company recommends that this
5 matter be addressed in a separate phase of this docket, along with any other changes that
6 may be proposed to the FPO.

7 **IV. COST OF GAS RATE AND BILL COMPARISONS**

8 **Q. How do the proposed winter 2023/2024 cost of gas rates compare with the previous**
9 **winter's rates?**

10 A. The proposed Non-FPO COG rate of \$1.5420 per therm is an increase of \$0.1413 or 10%
11 from the winter 2023/2024 approved rate of \$1.4007 per therm, in Docket No. DG 23-
12 084, which approved interim Cost of Gas rates.

13 The proposed FPO rate is \$1.5620 per therm, representing an increase of \$0.1413 per
14 therm or 10% from last winter's interim fixed rate of \$1.4207.

15 **Q. What are the primary reasons for the change in rates?**

16 A. The main reasons for the \$0.1413 increase are the smaller over-collection balance as
17 compared to the prior year and a slight decrease in projected sales while projected gas
18 costs remain relatively consistent with the prior year's projected costs.

1 **Q. What is the impact of the winter 2024/2025 COG rate on the typical residential heat**
2 **and hot water customer choosing the Non-FPO program?**

3 A. As shown on Schedule K-1, Column 7, lines 24 and 25, the typical residential heat and
4 hot water Non-FPO customer is projected to see an increase of \$45.59 or 7.1% in the gas
5 component of their bills compared to the prior winter period.

6 **Q. What is the impact of the winter 2024/2025 COG rate on the typical residential heat**
7 **and hot water customer participating in the FPO program?**

8 A. As shown on Schedule K-2, Column 7, lines 24 and 25, the typical residential heat and
9 hot water FPO customer would experience an increase of \$63.16 or 9.9% in the gas
10 component of their bills compared to the prior winter period.

11 **Q. Please describe the impact of the winter 2023/2024 COG rate on the typical**
12 **commercial customer compared to the prior winter period.**

13 A. Schedule L-1 shows that the typical commercial Non-FPO customer would see a \$169.88
14 or a 6.8% increase in the gas component of their bill and a 4.1% increase in their total
15 bill. Schedule L-2 illustrates that the typical commercial FPO customer would see a
16 \$243.19 or 9.9% increase in the gas component of their bill and a 6.1% increase in their
17 total bill.

18 **V. OTHER ITEMS**

19 **Q. What is the status of CNG currently?**

20 A. The Company began serving customers with CNG in October 2019. The service territory
21 for CNG is exclusive to the Monadnock Marketplace and several customers on Key Road

1 at this time. Xpress Natural Gas (XNG) is currently the Supplier; however, this contract
2 will expire on June 30, 2025. The Company completed a request for proposals for a new
3 CNG contract in which XNG will also be the Supplier. The new contract will start July
4 1, 2025 and expire June 30, 2028. The Company will otherwise follow the guidelines
5 from the most recent rate case settlement and orders governing any further conversion of
6 the Keene Division to natural gas.

7 **Q. What is the price differential between the cost of spot propane and the cost of CNG?**

8 A. For the upcoming peak period, spot propane is 17 cents per therm less expensive than
9 CNG. The calculation is Spot Purchases cost per therm found on Schedule C, line 30 less
10 the CNG Deliveries cost per therm found on Schedule C, line 23.

11 **Q. Does that comparison include the CNG demand charge?**

12 A. Yes.

13 **Q. Has there been any change to the allocation of the demand charge between the
14 summer and winter as compared to last year?**

15 A. No. The Company has allocated 75% of the demand charge to the winter period and 25%
16 of the demand charge to the summer period. In Order No. 26,505 (July 30, 2021), the
17 Commission approved the Settlement Agreement in the Company's distribution service
18 rate case, which adjusted this allocation to 75% in the winter period and 25% in the
19 summer period.

1 **Q. Can you comment on energy prices for the upcoming heating season?**

2 A. Compared to last year’s heating season, prices have been very stable with minimal
3 change. At this time last year, the 2023/2024 blended cost/price of gas was projected to
4 be \$1.30 per therm, but now the projected cost for winter 2024/2025 is projected to be
5 \$1.28. The Company has sought and continues to seek the lowest cost solutions for both
6 propane and CNG by locking in supply early using physical hedging, refilling storage in
7 off-peak periods, and using price optionality as outlined in our CNG contract to obtain
8 the least cost option in both winter and summer.

9 **Q. Please describe how the Company will meet its 7-day on-site storage requirement.**

10 A. The Company has a net storage capacity at its plant in Keene of approximately 75,000
11 gallons of propane. Additionally, Liberty has approximately 129,800 gallons of propane
12 at the Amherst storage facility located approximately 50 miles from the Keene plant.
13 This storage facility is shared between the Keene Division and EnergyNorth. In addition,
14 the Company has arranged a trucking commitment with Ciardelli Fuel Company for
15 transportation from this storage facility to the Keene plant. Further, the Company has
16 contracted for CNG deliveries to provide service to a section of its system. The firm
17 trucking arrangement coupled with onsite CNG trailers is more than enough to meet the
18 7-day demand requirement for the 2024/2025 peak period.

19 **Q. Does this conclude your testimony?**

20 A. Yes.