



**Liberty Utilities (St. Lawrence Gas) Corp.
Outreach and Communication Plan
Natural Gas Moratorium**



The Outreach and Communications Plan (“the Plan”) complements the Notice of Moratorium (“Notice”) and the New York State Customer Bill of Rights Upon Declaration of a Natural Gas Service Moratorium. As the declaration of this moratorium is a last resort and Liberty Utilities (St. Lawrence Gas) Corp. (“Liberty SLG” or “the Company”) has previously pursued various options to avoid the need for this action, it is now necessary to implement the moratorium and the Plan.

Following the filing of the Notice of Moratorium, the Company, in consultation with New York State Department of Public Service Staff (“Staff”), will expand this plan as necessary to address 1.) the scope of the impacted customers, 2.) the frequency of communication with Staff, stakeholders, and customers, 3.) necessary materials related to training, call center scripts, and bill messages, and 4.) a list of available energy alternatives and incentives. Communications will be developed in alternate languages if the county impacted includes a population of at least 20 percent that speaks a language other than English. Appendix A includes the Company assignments for Moratorium Outreach.

Declaration of a Moratorium

At least five working days prior to the Notice of the start date of the moratorium “open” period where service/work requests/applications will continue to be accepted, the Company will communicate with the following parties:

- The Governor of the State of New York
- The New York State Public Service Commission
- The New York State Department of Public Service
- Elected Officials (including the County Executive, Mayor(s) and Town Supervisors/Village Administrators in the impacted areas)
- Agency Leads (including the Code Enforcement Officer)
- Union Officials at IBEW Local 97

Additionally, in consultation with Staff, the Company will undertake the following activities in preparation for the commencement of the moratorium:

Employees that may potentially respond to customer inquiries (including but not limited to Customer Service Representatives (“CSRs”), the Business and Community Development team, and Gas Operation field employees) shall receive training on the moratorium. This will include call center scripts and key messaging regarding the issue that can be found in Appendix B.



The call center scripts will include the following basic information:

- The location of the moratorium (neighborhood/county)
- Why the moratorium was necessary
- Whom to contact with questions about their existing or new projects
- When the moratorium goes into effect/went into effect
- What rights do they have (see Customer Bill of Rights)
- What alternatives are available

Examples of talking points that will be added to relevant CSR scripts and messaging can be found in Appendix B.

Marketing and Communications will prepare moratorium-specific pages for posting on the Company's website (<https://www.stlawrencegas.com/>). It will include a map of the affected locations, contact information for relevant company representatives, and information associated with energy alternatives.

Examples of website content can be found in Appendix B.

Marketing and Communications employees will draft a press release, including information on the locations affected by the moratorium, the reason the moratorium was declared, and links to the Customer Bill of Rights hosted on the Company's webpage and the moratorium-specific web content.

An example of a draft press release can be found in Appendix C.

Marketing and Communications will develop content for social media on commonly used social media platforms at the time of this Plan's launch.

Marketing and Communications will develop content for broadcast media including radio or television, as appropriate.

Marketing and Communications will prepare modifications for any off-hour's communications platforms related to the moratorium. On-hold messaging will be revised in keeping with the same moratorium messaging.

Marketing and Communications will draft bill messaging (including on-bill electronic messages and bill inserts/communications) for distribution to customers within the moratorium area/gas franchise as appropriate.

Appendix B includes details that may be included in bill messaging.

Marketing and Communications will prepare a list of energy alternatives (including those managed by a third-party), and available incentives/efficiency programs for customers



Moratorium is in Effect/Open Application Period

Marketing and Communications will implement across all platforms and tactics the communications detailed in the previous section

Representatives from the Company will participate in a planned call to cover the following items:

- Reasons the company is initiating the Moratorium
- Timeframe for the Moratorium
- Deadlines for customers to submit requests for new gas service
- Areas affected by the Moratorium
- What resources the company can provide to those affected by the Moratorium
- Any upcoming calls or other information sessions to be offered by the Company.

Working with representatives from the Company, outreach and discussions (potential meetings) with plumbers and general contractors will be scheduled no later than one calendar week after the Notice.

Communications/meetings will include moratorium messaging, information on the anticipated length of time of the moratorium and how applications will be handled.

Marketing and Communications will:

- Use internal systems to disseminate messaging about the moratorium to all employees via the Company intranet, corporate email, and digital messaging boards
- Publish external-facing website
- Issue the drafted news release to local media distribution lists within the moratorium locations
- Update social media platforms with moratorium messaging
- Apply bill message, and
- Monitor social media for comments and/or questions.

Customer Case will update IVR message.

Paid media will be used to communicate as needed (e.g., TV and radio ads, digital ads, search-engine notification/messaging).

Marketing and Communications with Government Affairs and Business and Community Development will send the news release and notify all municipalities, agencies, and Ally Advantage contractors in affected areas of the



moratorium and provide background information. The news release will be sent to the following parties:

- All New York State and Federal elected officials in the affected regions;
- All affected local municipalities;
- Other governmental bodies in the affected regions such as mayor's Offices/Town Halls, County Executive' Offices in the Company's service territories, and County Legislatures;
- Other membership organizations and industry-specific groups whose members would be affected by the moratorium, e.g., landlords, builders, Ally Advantage contractors, or realtors associations.

A stakeholder outreach directory can be found in Appendix D.

Representatives from the Company will hold one public meeting to educate the public about the moratorium, alternatives, and their rights and attend all requested meetings with the impacted communities and any public meetings requested by the New York State Public Service Commission.

Energy Procurement will work with Operations, Business and Community Development, and Marketing and Communications to publish the list of alternate energy options and customer incentives for electrification and/or efficiency programs. The list will include contact information for NYS Clean Heat Program Manager for National Grid:

NYS Energy Company Contact Information can be found here:

<https://cleanheat.ny.gov/contractors-contact/>

Moratorium is in Effect/Application Period has Closed

A reminder message will be sent to all plumbers/contractors/developers and local agencies (agencies that address zoning, building codes and landmarks/historical preservation) that the moratorium is now in effect. This message will also be sent to all customers who have applied during the "open period" along with a link to the Customer Bill of Rights

New services messaging will be modified. Moratorium messaging will be provided with information on how to file a non-technical interest notification with the Company for future communications (including when the moratorium is able to be lifted).

The Company's moratorium-specific web pages will be updated to remind customers the moratorium is now in effect.



Community/stakeholder meeting requests will be honored by appropriate Company representatives.

Potential customers, landlords, prospective owners, or prospective renters will be provided with a phone number and an email address using the Company's domain address (@libertyutilities.com) to determine gas availability at a premise before the execution of a rental agreement, lease, or purchase.

The Company will provide status reports to Staff related to the number of customer requests received during the "open" application period and the number of customers who have requested interest in gas service if/when the moratorium is lifted

Lifting of Moratorium

The lifting of the moratorium will require the following communications:

Notification will be sent to the Governor's Office, the New York State Public Service Commission, and the New York State Department of Public Service officially ending the moratorium

Operations/Business and Community Development will accept new work requests. Working with representatives to the Company, technical meetings with plumbers and general contractors will be scheduled no later than one calendar week after the notice of the lifting of the moratorium.

Business and Community Development or Operations will contact customers on the list maintained for the duration of the moratorium who previously expressed interest in gas service.

Marketing and Communications will announce the moratorium has been lifted via press release, customer email, and social media, and unpublish the moratorium-specific web pages from the Company's website.

Local agencies will be notified that the moratorium is no longer in effect



Appendix A

Company Assignments for Moratorium Outreach

- Technical & Customer Communications:
 - Business Development, Senior Regional Manager, or designee;
 - Engineering and Resource Planning & Customer Care, Senior Manager, or designee;
 - Marketing and Communications, Senior Manager, or designee;
 - Operations, Director, or designee;
 - Energy Procurement, Director, or designee;
 - Legal, Director, or designee

- PSC/DPS Notices: Director, Rates and Regulatory Affairs, or designee;
- Call Center Staff: Director, Customer Experience, or designee
- Customer Outreach/Bill Messaging:
 - Director, Customer Experience, or designee;
 - Marketing and Communications, Senior Manager, or designee
- Corporate Spokesperson:
 - Marketing and Communications, Senior Manager, or designee
- Digital Content/Website: Marketing and Communications, Senior Manager, or designee;
- Employee Communications Liaison: Director, Customer Experience, or designee
- Government Relations Liaison: Vice President, Government Affairs, or designee



Appendix B

All samples included in this Appendix are considered a draft and subject to additional review and modification. If a future natural gas moratorium is declared samples will be modified to reflect the specific details for that moratorium and other relevant updates not available at the time of drafting.

Website Example:

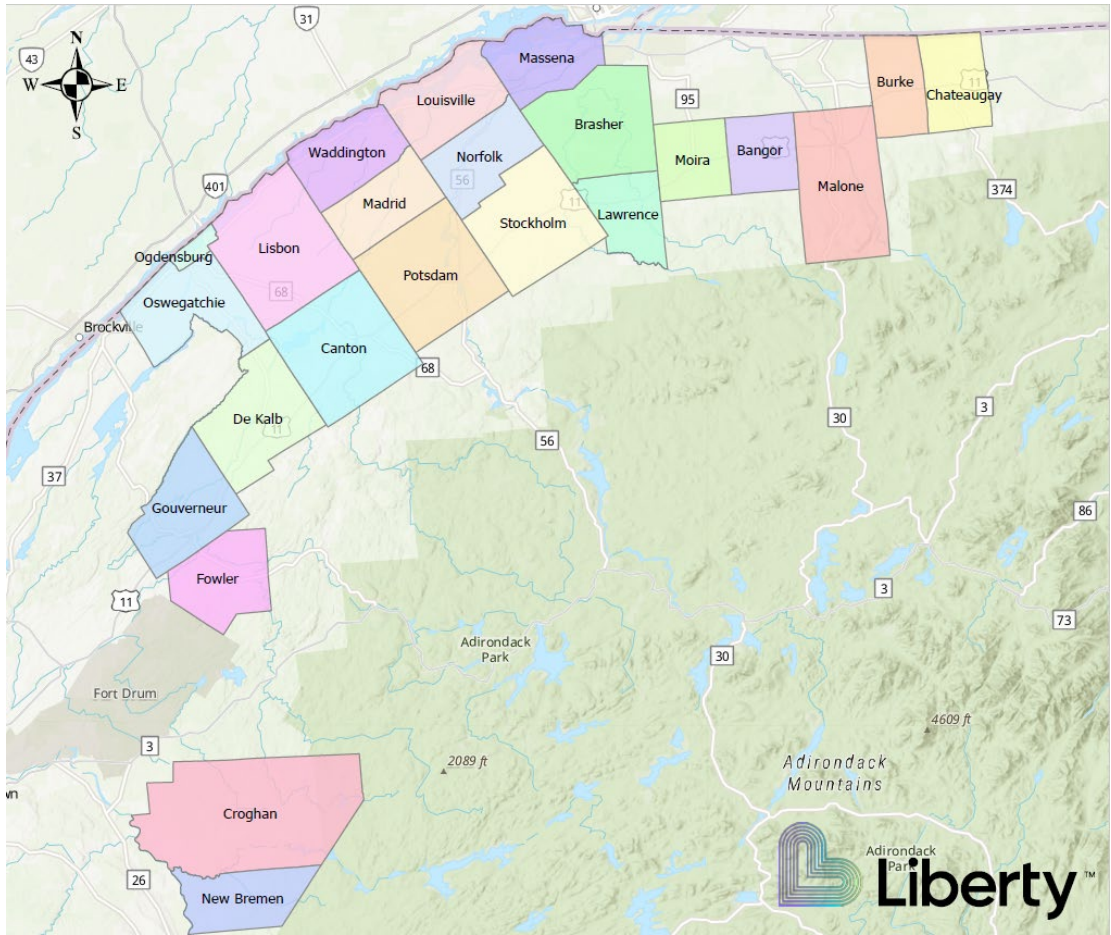
About the natural gas moratorium

Beginning [*date*] we will no longer accept applications for new natural gas connections in most of our [*area*] service area.

The demand for natural gas is outpacing supply on the coldest days, preference for natural gas use in new building construction projects, and constraints on interstate pipelines that bring natural gas to customers in [*area*]. These constraints do not affect our existing customers but limit our ability to serve new customers on the coldest days, when demand for natural gas is at its peak.

Moratorium area

Beginning [*date*], we will no longer accept applications for new natural gas connections in the areas noted below. [*legend to include specific areas affected and not affected by moratorium, service area wide map placeholder below for illustrative purposes only.*]



Who does the moratorium impact?

Within the defined area, the moratorium applies to:

- [placeholder for impacted new customers and natural gas end use]

You may still be able to connect to natural gas in [area] if you:

- [placeholder for customers not impacted in moratorium area]

If you're interested in natural gas within the moratorium area and would like to be notified if it becomes available, please contact us here [placeholder email or form] with your contact and equipment information.



Natural gas alternatives and incentives

We can help you find energy options for your home or business. As you research the best energy options for your property, explore our resources and incentives on alternatives.

[placeholder for additional alternatives available that may include cleaner heat, incentives, and any other applicable alternatives] or contact NYS Clean Heat Program Manager for National Grid:

NYS Energy Company Contact Information can be found here:

<https://cleanheat.ny.gov/contractors-contact/>

Frequently Asked Questions (FAQs)

Q. Why do you need a moratorium?

A. We've made great strides in our efforts to improve the air quality in our service area, largely due to customers switching from heating oil to natural gas. However, the demand for natural gas is outpacing its availability due to interstate pipeline supply constraints coming into a portion of our service area. We made every effort to explore alternatives to avoid a moratorium on new natural gas connections. While we are advancing new solutions—including substantial reductions in usage by existing customers and deploying compressed or renewable natural gas—we have not identified enough alternatives at this time to meet growing natural gas demand. We will continue to investigate interstate pipeline projects that meet federal, state, and local requirements that could increase available supply.

Q. When can I submit an application?

A. New applications for interruptible service and natural-gas-fueled emergency generators will continue to be accepted. To be contacted in the future if natural gas becomes available, please email us your contact and equipment information.

Q. My town is not in your moratorium area. Does that mean I can get gas at any time?

A. New applications for service will continue to be accepted for those areas not designated a moratorium area.

Q. How long will the moratorium last?



A. The moratorium will remain in effect until sufficient supply is available to meet new demand. That can be through additional non-pipeline alternatives, or a pipeline project that meets federal, state, and local requirements. We're here to help you find long-term alternatives to natural gas for your heating, hot water, laundry, and cooking needs. Please contact the NYS Clean Heat Program Manager for National Grid:

NYS Energy Company Contact Information can be found here:

<https://cleanheat.ny.gov/contractors-contact/>

Talking Points for CSR Scripts, Bill Messages, and e-Messages

The location of the moratorium (neighborhood/county)

Why the moratorium was necessary

Whom to contact with questions about their existing or new projects

When the moratorium goes into effect/went into effect

What rights do they have (see Customer Bill of Rights Appendix E)

What alternatives are available

Liberty
Media Relations
eastmedia@libertyutilities.com
(603) 216-3623



Liberty™

Liberty Announces Natural Gas Moratorium

Massena, NY, XXXX XX, XXXX – TBD

DETAILS will include:

- The location of the moratorium (neighborhood/municipality/county)
- Why the moratorium was necessary
- Whom to contact with questions about existing or new projects
- When the moratorium goes/went into effect
- What rights do they have (see Customer Bill of Rights)
- What alternatives are available

About Liberty

Part of Algonquin Power & Utilities Corp., Liberty is committed to providing safe and reliable natural gas, water, and electricity distribution services to over one million customer connections. Liberty's utility operations are primarily located in the United States and Canada and have expanded to Chile and Bermuda. With a customer-centric approach to management, Liberty seeks to provide a superior customer experience through local management, conservation and energy efficiency initiatives, and programs for businesses and residential customers. We measure our performance in terms of service reliability, customer satisfaction, and public and workplace safety. Liberty's North American distribution operations include Arizona, Arkansas, California, Georgia, Illinois, Iowa, Kansas, Massachusetts, Missouri, New Hampshire, New York, Oklahoma, and Texas in the United States, and New Brunswick in Canada. For more information, please visit www.libertyenergyandwater.com.



Appendix D

Stakeholder Outreach Directory

The Company's service area includes portions of St. Lawrence, Franklin, and Lewis Counties, which include the towns and villages of Beaver Falls\New Bremen\Croghan, Brasher\Winthrop, Brushton, Canton, Chateaugay, Gouverneur, Heuvelton, Lisbon, Madrid, Malone, Massena, Norfolk, North Lawrence, Norwood, Ogdensburg, Potsdam, and Waddington.

<u>State of New York</u>	
New York Governor	Executive
Public Service Commission	Chairman
Department of Public Service	
Office of State Senator Mark Walczyk	
Office of State Senator Daniel Stec	
Office of Assemblyman Scott Gray	<u>District 116</u>
Office of Assemblyman Ken Blankenbush	<u>District 117</u>
Office of Assemblyman Billy Jones	<u>District 115</u>
<u>County</u>	
St. Lawrence	Executive
Franklin	Executive
Lewis	Executive
<u>Town/Village</u>	<u>Mayors/Town Supervisors</u>
Town of Bangor	Town Supervisor
Beaver Falls Village	Mayor
Town of New Bremen	Town Supervisor
Burke Village	Mayor
Town of Burke	Town Supervisor
Croghan Village	Mayor
Town of Croghan	Town Supervisor
Town of Brasher	Town Supervisor
Town of Winthrop	Town Supervisor
Brushton Village	Mayor
Canton Village	Mayor
Town of Canton	Town Supervisor
Chateaugay Village	Mayor
Town of Chateaugay	Town Supervisor
Town of De Kalb	Town Supervisor
Town of Edwards	Town Supervisor
Town of Fowler	Town Supervisor
Gouverneur Village	Mayor
Town of Gouverneur	Town Supervisor
Heuvelton Village	Mayor
Town of Heuvelton	Town Supervisor
Town of Lisbon	Town Supervisor
Town of Madrid	Town Supervisor
Town of Moira	Town Supervisor
Malone Village	Mayor

Town of Malone	Town Supervisor
Massena Village	Mayor
Town of Massena	Supervisor
Town of Norfolk	Town Supervisor
Town of Lawrence	Town Clerk
Town of Louisville	Town Supervisor
Norwood Village	Mayor
Ogdensburg City	Mayor
Town of Oswegatchie	Town Supervisor
Potsdam Village	Mayor
Town of Potsdam	Town Supervisor
Town of Stockholm	Town Supervisor
Waddington Village	Mayor
Town of Waddington	Town Supervisor
<u>Business Organizations/Other</u>	
Canton Chamber of Commerce	
Massena Chamber of Commerce	
St. Lawrence Chamber of Commerce	
Potsdam Chamber of Commerce	
Ogdensburg Chamber of Commerce	



Appendix E

On June 27, 2022, pursuant to Ordering Clause 2 of the Commission’s Order, the Joint LDCs submitted a draft New York State Customer Bill of Rights to be issued upon declaration of a natural gas service moratorium. A copy of the draft can be found at:

<https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={247F4856-E2BF-450C-BD56-A69AF597B126}>

The Customer Bill of Rights is subject to Commission review and approval. Liberty SLG will incorporate the final version of the Customer Bill of Rights in its communications plan once adopted by the Commission.