

May 16, 2025

Dear Erica Menard:

On May 12, 2022, the Public Service Commission adopted modernized long-term natural gas planning and moratorium management procedures in Case 20-G-0131.¹ The gas planning order requires, among other things, for all the State's major gas local distribution companies (LDCs) to file initial long-term gas plans and provide annual reports on the progress of its plan. Since the long-term plans provide visibility into supply and demand over a longer timeframe than the next winter, Staff will continue its annual review of winter preparedness.

Staff's data request is attached. Please use the format included in the templates provided. In the event that any of the requested information is considered privileged by your company, include the label "business confidential" and file with the Records Access Officer as described on the Department's website. Also, please include the case number (**Case 25-M-0183**) in all cover letters, so that the filing can be properly managed.

Your initial responses should be provided to us no later than **July 15, 2025, using end-of-month June data with the initial submission**. Updates will be required within the first week of each month for September, October, November, and February to complete our review process. Staff anticipates making a presentation to the Commission at the October Session. Additional updates may be required if conditions warrant.

We will contact you to arrange the formal meetings or conference calls to discuss your company's winter outlook, if necessary. If you have any questions, please call me at (518) 474-8392 or George Coffin at (518) 486-4813. We can also be reached via email at: Davide.Maioriello@dps.ny.gov or George.Coffin@dps.ny.gov.

Sincerely,

Davide Maioriello
Utility Supervisor

Gas System Planning & Reliability Section
Office of Energy System Planning & Performance

¹ Case 20-G-0131 – Proceeding on Motion of the Commission in Regard to Gas Planning Procedures, Staff Gas System Planning Process Proposal, filed February 12, 2021.

Case 25-M-0183 - Winter Supply Review Data Request

1. Table 1: System design day capacity (**FIRM ONLY**) capability by service area (or gate when indicated) and peak design day demand by service area (or gate when indicated). Please include all capacity volumes, including all recallable capacity assets that are available or needed for peak design day and specify the volumes supporting sales, transportation customers and retail access capacity release. Include last year's 2024-2025 Table 1 (final update) data for purposes of comparison. Include and show all on-system peak and base supply assets such as LNG, CNG, RNG, and demand response type resources being used together with the total capacity capability showing that it meets or exceeds the design peak day demand value provided. Identify any projected capacity assets that are not yet finalized but will be prior to the upcoming winter heating season, including both a description and projected completion date. Do not include non-firm supply sources.

See Table 1 in the attached workbook entitled “Case 25-M-0183 – Winter Supply 2025-26 Forms OCT UPDATE FINAL.xlsx”

2. Table 2: Estimated annual, winter season, and daily requirements by service area (or gate when indicated) for last year and the next five years, using design weather. Include a description of the design weather criteria and explain any changes from the previous year. The 2024-2025 actual data experienced last year is to be included for purposes of comparison. Also include any and all service areas (or gate stations when indicated) where moratoriums have been put into place or have the possibility of being instituted in the next five years. Identify where any curtailments to firm customers may occur.

See Table 2 in the attached workbook entitled “Case 25-M-0183 – Winter Supply 2025-26 Forms OCT UPDATE FINAL.xlsx”

3. Table 3: Same information as requested in (2) but using normal weather. Include a description of the normal weather criteria and the calculation methodology. The 2024-2025 data submitted last year is to be included for purposes of comparison. **Please Note: if Table 3 is based on a sales forecast using anything less than 30 years of weather data, no part of Table 3 may be used to develop any part of Table 2.**

See Table 3 in the attached workbook entitled “Case 25-M-0183 – Winter Supply 2025-26 Forms OCT UPDATE FINAL.xlsx”

4. Identify your source for heating degree day (HDD) data, including the specific weather data points used for forecasting purposes. Describe your source and/or your calculation of design day and design winter data (i.e., calculated from normal usage or an actual historic period). Identify the time periods used to develop usage per HDD for both design and normal usage and explain the frequency of updates. **If 30 years of data is not being used for design, please explain why.**

- a. Please explain how usage per HDD for the peak period is calculated and verified.

Degree Day information is gathered from Accuweather.com (linked to NOAA) at the Massena weather station. The Company design peak day is 85-degree days, which is based off a historical peak day from 1993. The time period used for normal supply projections is a rolling 5-year average based on the most recent period and is updated annually. The Company's growth has been stagnant over the past several years, with a 5-year horizon providing accurate forecasting data. Design day usage projections use longer term (30 years or longer) data sets.

- b. Please include any other variables such as wind speed that are used to calculate design day load and how they are used in the calculation.

- N/A

- c. If you employ a reserve margin for design day capacity, specify how it is calculated and the total amount.

- N/A

5. Given that New York State's building codes, beginning in 2026, will eliminate the use of fossil fuels in most new construction building applications, explain how that has been incorporated into the sales forecast for winters 2025-2026, and beyond. Please also provide any forecast increase in demand anticipated leading up to the restrictions, in terms of incremental load.

The demand growth, especially as it relates to new construction, in the Company's franchise area has been modest for the past few years. The upcoming prohibition will not have a marked impact to growth forecasts relative to any demand switching to or from other fuel sources.

6. Describe the load forecasting tools used to develop the above forecasts. Indicate how all the natural gas efficiency programs, Demand Response Programs, Microgrids, and Non- Pipe Alternatives (NPA) conducted by your company, contractors or the New York State Energy Research and Development Authority (NYSERDA) have been incorporated into these forecasts and your capacity planning. Provide a summary of the projected energy savings and the actual savings realized to date. How are these savings translated into the normal usage projection in Table 3? Also please indicate how your compliance with the requirements of Case 18-M-0084 will affect the peak day load for each year in your five-year forecast.

The design weather volumes are based on a 10% increase in heat sensitive loads over the winter period. The Company's most recent rate plan, issued and effective June 22, 2023, includes a Demand Response Program and increased potential/new customer education about non-pipe alternatives. However, until the Company collects and analyzes post-implementation data, no projected energy savings will be incorporated. The Company has not actively participated in Case 18-M-0084.

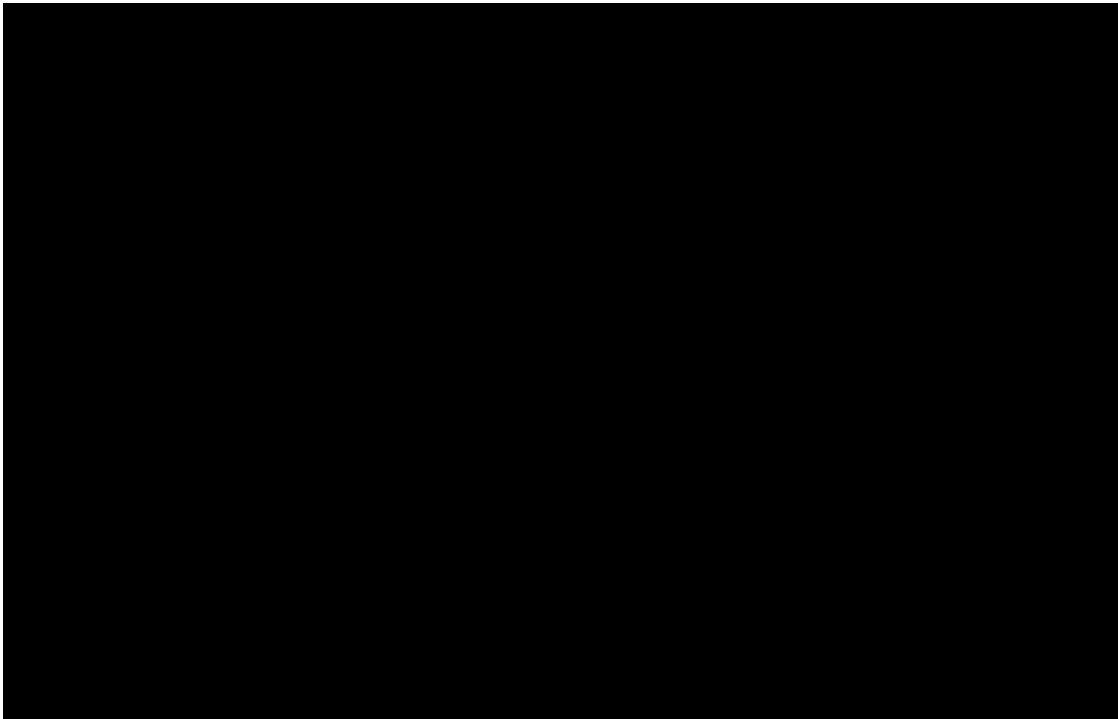
Liberty SLG does not currently have any vulnerable locations, assuming that contracts for winter peaking supplies continue to be available. Liberty SLG has never had any issues contracting for winter peaking supplies and receives interest from multiple

parties when it solicits bids through its RFP process, so it is reasonable to expect these contracts will continue to be available. Liberty SLG also does not have a leak-prone pipe replacement program due to it having a newer system compared to most other New York LDCs. Therefore, neither vulnerable locations nor leak prone pipe replacements present any opportunities for NPAs in Liberty SLG's service territory. If any future projects become potential candidates for an NPA solution, the Company would plan to evaluate the potential NPA in accordance with its 2022 NPA Screening Criteria Proposal.⁶⁹ Although, the Company notes that the Commission has not acted on the Company's NPA Screening Criteria Proposal. If potential NPAs are identified in the future, the Company will develop the applicable educational programs, conduct community outreach, and provide updates in future filings.

7. If you do not utilize AMI for load forecasting, explain what tools you are using to estimate typical customer design day demand. If your customer metering systems have recently switched over to AMI please indicate when the above forecasts will include the use of such customer data and what forecasting tool modifications are being considered for new forecasts going forward.

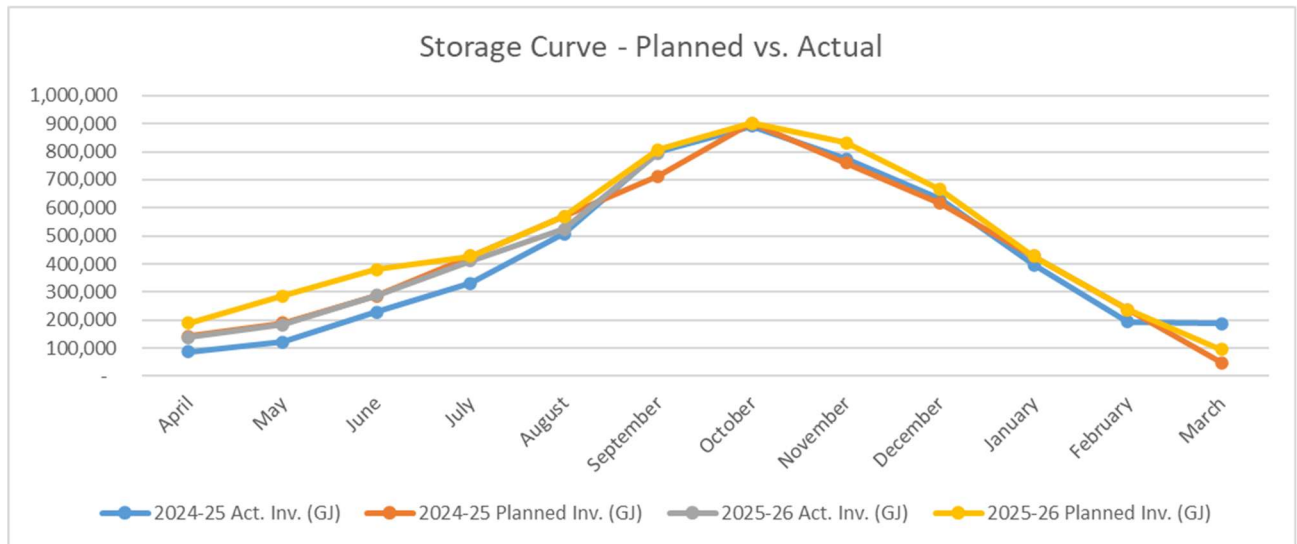
The design weather volumes are based on a 10% increase in heat sensitive loads over the winter period.

8. Provide a winter season load duration curve for the 2025-2026 send out year that shows how supplies can meet a severe winter season and peak design day. This should be provided for each service area (or gate when indicated). Include all data in an unlocked digital Microsoft Excel file.



9. Provide this years and last years planned storage curves versus actual storage curves for

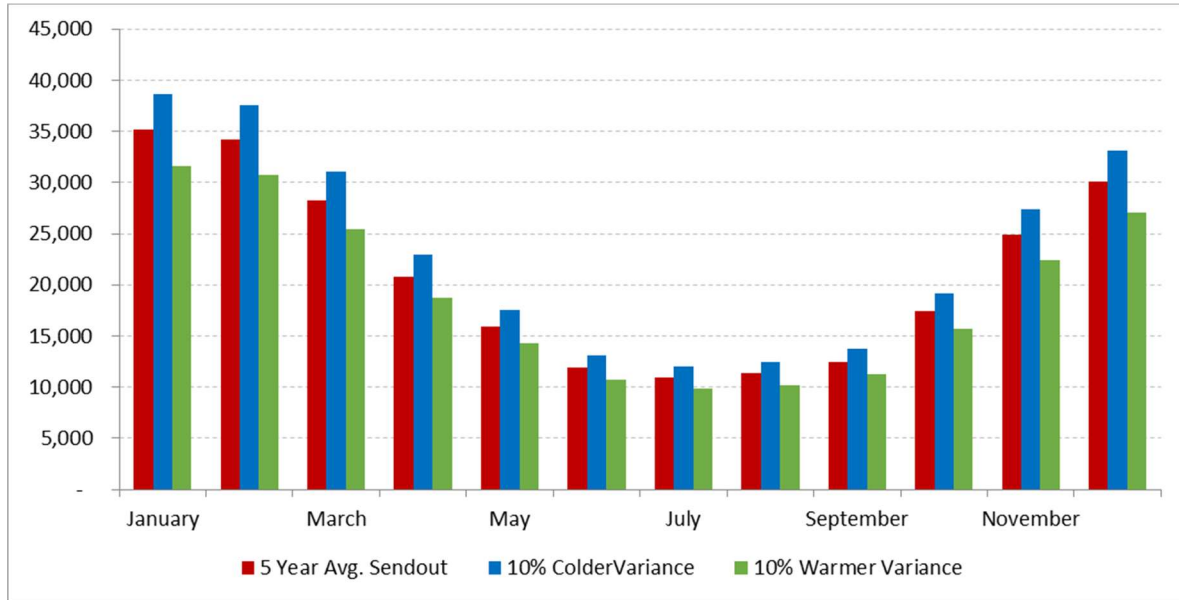
injections and withdrawals.



- Describe the storage injection plan for this injection season and highlight any modifications from the prior year plan.

The Company plans to fill its contract storage space over the months of May through October with the objective of achieving an approximate balance of 95% of capacity prior to November 1, 2025. A growing number of RNG contracts have required small adjustments to the refill schedule this year to reduce early injection purchases, with the expectation that RNG production would contribute to increased summer injections. In an effort not to refill storage too quickly and risk being over 100% full before the end of October, the Company is waiting to gauge refill pace and perhaps increase late season injection volumes. Storage inventories have been slightly behind normal levels this season and routine injections are expected for the remainder of summer. As always, actual injections can fluctuate based on weather; however normal cycling of storage inventory is expected, consistent with prior years. See the attached workbook “Data Support – 8_9_11.xlsx”.

- Provide a send out schedule (or curve) for peak day forecasting requirements under the varying conditions that are considered in developing the estimates (e.g., temperature, wind, weekend/weekday, etc.).



12. Gas supply portfolio information (highlight changes as indicated on the charts, including all capacity or supply contracts remaining to be finalized prior to the winter heating season):
- Table 4: Transportation capacity data including contract volumes and expiration dates.
 - Table 5: Storage capacity data, including contract volumes and expiration dates.
 - Table 6: Gas supply contract data including contract volumes, terms, and expiration dates. This table must include and show all contract data associated for on system, delivered services, and peak supply assets such as LNG, CNG, RNG, indicating any new additions since the previous year and list demand response programs by type and customers served by service classification.
 - For CNG contracts, please provide the terms under which the vendor is expected to perform, including any temperature triggers and whether there are provisions in vendor contracts for emergency provision of CNG.
 - In light of extreme weather events that have impacted upstream supply, what actions have been taken to enhance capacity/transportation contracts in order to mitigate delivery risks?

See Table 4, 5 & 6 in the attached workbook entitled “Case 25-M-0183 – Winter Supply 2025-26 Forms OCT UPDATE FINAL.xlsx

13. Describe, if applicable, current practices and any anticipated changes related to on-system peaking facilities and other peak shaving techniques. If you operate LNG peaking facilities, please describe current plans for any activities at the facilities that would interrupt their availability and steps being taken to mitigate those interruptions. Please describe all necessary maintenance activities that will take place in the gas year that began on April 1, 2025, and ends on March 31, 2027.

Not Applicable. St. Lawrence does not have any (current or planned) on-system peaking facilities. The only peak shaving techniques currently serving the utility are small on-system RNG projects which reduce the need for contracted (gate delivered) peaking supply. The Company continues to add additional on-system RNG supply where feasible to further reduce the need for winter peaking service.

14. Provide an analysis detailing the accuracy of the 10 days with the coldest average temperature during the last heating season by using a back cast after the actual weather is known.

Top 10 Coldest days:

**Feb 2/25 (Sun) – 69 HDD – Total Demand – 35,968 Dth, Supply = 35,703 Dth (99.3%)
Feb 5/25 (Wed) – 65 HDD – Total Demand – 39,814 Dth, Supply = 39,320 Dth (98.8%)
Mar 2/25 (Sun) – 65 HDD – Total Demand – 37,302 Dth, Supply = 37,195 Dth (99.7%)
Dec 22/24 (Sun) – 64 HDD – Total Demand – 39,995 Dth, Supply = 40,098 Dth (-0.3%)
Feb 1/25 (Sat) – 63 HDD – Total Demand – 42,122 Dth, Supply = 41,506 Dth (98.5%)
Jan 6/25 (Mon) – 62 HDD – Total Demand – 37,509 Dth, Supply = 37,696 Dth (-0.4%)
Jan 30/25 (Thu) – 62 HDD – Total Demand – 35,902 Dth, Supply = 36,370 Dth (-1.3%)
Jan 22/25 (Wed) – 61 HDD – Total Demand – 38,404 Dth, Supply = 37,351 Dth (97.3%)
Feb 19/25 (Wed) – 60 HDD – Total Demand – 40,094 Dth, Supply = 40,157 Dth (-0.2%)
Feb 20/25 (Thu) – 60 HDD – Total Demand – 35,879 Dth, Supply = 35,361 Dth (98.6%)**

15. Provide a detailed description of any existing asset management or asset optimization agreements, including reverse asset management agreements, as well as any such agreements being considered or planned. All agreements that include firm capacity and/or supply that is recallable during the winter heating season should be included in Table 1. This should include a quantification of the benefits to customers.

[REDACTED]

16. Provide a description of your company's plans and strategy with respect to off-system sales, capacity release and streaming arrangements for the past winter season as well as any such transactions that extend beyond the coming winter.

[REDACTED]

[REDACTED]

17. Mandatory capacity release and grandfathered capacity programs.

- a. Status of marketer compliance with the Commission's primary point capacity requirement for grandfathered capacity. Include how much grandfathered capacity remains on your system.

Not applicable. SLG has no grandfathered capacity.

- b. Please describe the methodology utilized to determine the mandatory capacity release to the marketers. Indicate how this compares with the methodology utilized to determine capacity required for firm sales customers.

Liberty SLG does not release capacity to natural gas marketers.

- c. Please describe how your company keeps marketers informed of changes in procedures. Include the frequency and past/proposed dates of marketer meetings relating to the 2024-2025 and 2025-2026 heating season.

The Company has less than five (5) marketers serving its transportation customers. Marketer meetings are not regularly scheduled, however when there is a transportation customer meeting, marketers are included and there is regular communication between the Company and marketers on behalf of customers.

- d. List all the pipelines and each allocation percentage being utilized for the mandatory assignment of capacity. Provide the methodology the Company uses to select which pipelines are released. If a pipeline is not included in the allocation, explain why.

Not applicable.

- e. Please provide a comparison between your company's weighted average cost of capacity and the charges paid by marketers and direct customers for released capacity. What process, if any, is utilized to true-up any differences?

There is no difference between capacity costs and charges paid by direct customers. No true-up is required.

- f. Please describe any assets retained by the company that are not released to marketers but are necessary to meet gas loads on days colder than 50 HDDs, and describe how those costs are assessed to marketers, including whether their customers are directly charged instead of the marketer.

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- g. Please indicate if any marketers serving core customers on your system do not have firm primary point capacity for all delivery quantities during winter months and identify the anticipated shortfall.

There were no instances of marketers failing to perform as anticipated during the previous winter.

- h. Please include the Gas System Planning & Reliability Section, Office of Energy System Planning & Performance staff on all informational ESCO/marketer meetings and teleconferences.

See the above response to 17c. The Company will continue to include the Gas System Planning & Reliability Section, Office of Energy System Planning & Performance staff on all future meetings and teleconferences.

18. Provide the following information with regards to Interruptible Service:

- a. Temperature/weather criteria at which the interruptible service classifications are to be interrupted for this upcoming winter. If the interruption criteria have not yet been developed for the upcoming winter, provide the response as part of the September update.

Liberty closely monitors gas flow throughout the winter and during cold weather events to ensure adequate capacity for all customers. Notification is sent via email and/or phone at least 24 hours prior to any necessary interruptions. Currently, there is not a specific Heating Degree Day (HDD) criterion that has been established for the upcoming winter.

- b. Description and status of efforts to verify customer alternative fuel availability and equipment testing and provide the number of process customers that are exempt from maintaining alternate fuel supplies.

The Company will visit all interruptible customers, including those with dual-fuel capabilities, in the fall to verify their readiness to go off natural gas service. These visits are part of Liberty's standard procedure to ensure compliance and preparedness.

- c. Please provide the total number of firm dual fuel and interruptible customers, by service class, including how many customers are remotely controlled by the utility, and how many customers must switch to their alternate fuel manually. Methods utilized to verify dual-fuel customers' capabilities, including power generation customers.

Liberty currently has two Interruptible Sales customers and six Interruptible Transportation customers. All but two of these interruptible customers are dual-fuel

capable. During times of interruption, customers either curtail operations [REDACTED] or completely shut down [REDACTED]. All dual-fuel customers must switch to their alternate fuel manually. No customer meters are controlled remotely. Verification of dual-fuel capability is conducted through annual site visits.

- d. Provide the dates and hours of duration for each non-generator interruption for the past five winter heating seasons. Include the number of customers interrupted for each event, the number of customers who failed to comply and the total dollar value of penalties received as a result.

The Company has not had any service interruptions for the past five winter heating seasons.

- e. Provide the dates and hours of duration for each interruption of electric generation service classes for the past five winter heating seasons. Include the number of customers interrupted for each event.

This item is not applicable.

- f. Please provide the results of compliance with the interruptible rules during last winter. Be sure to include the number of customers switched to firm service or removed from gas service due to non-compliance.

The Company experienced no interruptions during the last winter season. As a result, there were no compliance issues as a result no customers were switched to firm service or removed from gas service due to non-compliance.

- g. How many customers will be visited out of how many customers in total? Will all customers with non-compliance issues last winter be visited? How often will the complaint customers be visited?

Liberty has two Interruptible Sales customers and six Interruptible Transportation customers. All interruptible customers will be visited annually. Since there were no non-compliance issues last winter, no additional visits are required beyond the standard annual inspections.

- h. What are the alternate fuels and how many customers are in each fuel category?

The alternate fuels used by Liberty's interruptible customers are No. 2 oil and No. 6 oil.

- i. Are affidavits required? What is the status of customer compliance with this requirement and how many customers that have been asked to provide affidavits still have not complied? What was the total dollar value of any ensuing penalties and what was the disposition of those received penalty amounts?

Affidavits are not required by Liberty.

- j. Is the company aware of any issues regarding interruptible customers not receiving their oil deliveries during the winter season? If so, please provide details of when and where this occurred, as well as what the company would suggest could be done to help these customers.

The Company is not aware of any problems with interruptible customers receiving their fuel oil deliveries during the winter season.

- k. Will you be modifying your procedures for verifying alternate fuel inventories being held by interruptible customers (including generators and temperature-controlled customers)? If so, how? If affidavits are not used, explain why not?

No modifications to the Company's current procedure are required. Liberty is exempt from the order requiring interruptible customers to have provable storage capacity and alternate fuel on hand. As a result, affidavits are not used.

- l. In comparison to previous winters, were there any market related impacts to alternative fuel availability? If so, please describe the impact(s).

The Company is not aware of market-related impacts to alternative fuel availability during the previous winter season.

19. Describe the methods used to communicate with interruptible customers, their marketers/fuel suppliers, NYSERDA and the various Oil Associations in New York prior to, and during, periods of interruption. Have you made or are you planning to make any changes to these communications based on lessons learned from extreme weather? If yes, what are the changes? Highlight any modifications to communication methods for the upcoming winter season compared to those used last winter.

There have been no modifications to the communication methods for the upcoming winter season compared to those used last winter. As in previous years, Liberty SLG communicates with interruptible customers, their marketers or fuel suppliers, NYSERDA, and the various oil associations in New York via email and/or phone. At least twenty-four hours prior to a potential curtailment, Liberty sends a notice of possible curtailment. If curtailment becomes necessary, a phone call is made with as much notice as possible, typically no fewer than four to six hours in advance. When curtailment is suspended, a follow-up phone call is made to inform the customer.

20. A current organization chart for your company's gas supply department. Please include a list of contact people for the winter season for updated storage, peaking and other supply related information and highlight any personnel changes since last winter. Include the chief dispatcher and telephone numbers for both weekdays and weekends.

[REDACTED]

21. A description of your company's gas purchasing strategy, including:

- a. Information regarding gas purchases for last year and any planned changes for this year. Did your experience during last winter lead to any changes? If so, what are the changes? If not, why not? Please include an identification of each amount of RNG, CNG, LNG, and Differentiated Natural Gas purchased.

Winter purchases will continue on a least cost basis, consistent with prior years and delivered to Cornwall/Iroquois under the existing AMA which began November 1, 2023 using SLG's assigned capacity on TransCanada PipeLines Limited ("TCPL") and Iroquois Gas Transmission System ("IGTS").

Actual commodity prices were fairly consistent with the forecasted cost of gas. Natural gas markets have increased slightly, but have been relatively stable in 2025, related primarily to NYMEX markets.

The Company remained consistent in its purchasing strategy with a few changes. Storage inventories last winter were cycled as normal to reduce GAC prices. The expectation is to replace inventory during this summer injection season at prices below last winter. Hedge transactions have not been executed yet for this winter, but should be executed within the next month. Hedge volumes are anticipated consistent with prior years.

The Company continues to work towards additional RNG project deliveries heading into this winter season, with five projects currently developed and online. Volumes have averaged roughly 750 Dth/d and will not significantly impact the Company's purchase strategy. Additional projects continue to surface, and the Company will continue to seek RNG opportunities going forward.

- b. The types of contracts and associated contract flexibility.

Currently, the Company utilizes storage capacity contracts, long term firm (both for long haul and short haul), winter firm delivered contracts (as needed) and peaking contracts. These contracts provide balanced opportunity and flexibility to adjust gated supply regularly if needed.

- c. The extent of planned reliance on firm gas, spot gas, swing gas, etc.

The Company primarily utilizes firm supply, transportation, and storage contracts to meet demand. Peaking contracts and spot purchases are for supplemental supply only.

- d. The description of any triggers to purchase spot (daily) gas.

The Company purchases spot (daily) gas primarily as a final option in situations where all available capacity is fully utilized or if curtailment volume is projected to cause inadequacies or if prices are favorable.

22. A description of your company's gas price risk management strategy, including answers to the following questions:

The Company employs an annual financial hedging program, the objective of which is cost stabilization rather than as a price mitigation program. The Company also has a physical hedging instrument in the form of storage. The overall objective of the Company's supply plan however is to provide safe, reliable and least-cost gas service to its customers, which includes price risk management.

- a. What percentage of your gas supply do you hedge (1) physically and (2) financially? Please break this down between storage and distinguish among the types of financial contracts used.

The Company contracts for 900,426 MMBtu of storage, which serves all customers (sales and transportation). This represents roughly 12.5% of its total annual customer usage. The Company does not execute any financial hedges on its storage injections.

Each year, Liberty SLG enters into a financial hedge for between 10% and 15% of its total forecast winter demand volume.

- b. If you use fixed price contracts, how, when and in what increments are they purchased?

The Company does not purchase any fixed price contracts at this time.

- c. Please provide the breakdown between futures and options (include quantities of each type on an annual and winter season basis). How do you finance your swap/futures? Do you pay for them at the time of purchase or delivery?

The Company hedges between 10% and 15% of its winter gas supply using financial instruments. The Company uses a consulting group to analyze and advise of the most viable timing and hedging instrument. In recent years these transactions have been executed as Futures Swaps.

- d. Describe the types of options you use, when they are used, and why these are better than other instruments.

Not applicable.

- e. How much and what percentage of total gas costs, booked to the GAC, did you spend on options in each of the last five winters and how much do you plan to spend in the winter of 2025-2026?

Over the past five years, no premiums associated with options have been booked to gas cost.

- f. How far out, when, and in what increments do you purchase futures?

These transactions are typically transacted in the summer (April to October) preceding the upcoming winter period (November to March).

- g. How has your hedging strategy changed in the past year? Did your experience during last winter lead to any changes? If so, what are the changes? If not, why not?

There have been no changes to the hedging strategy in the past year, however the Company expects to closely monitor market pricing this year, as volatility has increased this year versus last year.

- h. Table 7: Actual price hedging and supply performance versus planned price hedging and supply performance for last year, a summary of “lessons learned”, and arrangements for this year. Include separate quantities for each hedging instrument.

See Table 7 in the attached workbook entitled “Case 25-M-0183 – Winter Supply 2025-26 Forms OCT UPDATE FINAL.xlsx”

23. Provide the percentage of winter season and annual supplies by region including Gulf, continental US shale regions, and Canadian sources.

Currently, the vast majority (>95%) of St. Lawrence’s natural gas supply is sourced in Canada, either from the Western Canadian Sedimentary Basin (“WCSB”) at Empress, AB or from Dawn, ON, which is a commingled natural gas trading HUB, with supply origins from multiple sources, including Gulf, continental US shale regions and Canadian sources. Only SLG’s on-system (RNG) supply projects, which account for less than 5% of total annual supplies are not sourced in Canada.

24. How has your use of local production/landfill/renewable gas changed over the past year?
Please provide the average daily volumes of local produced gas acquired for the previous heating season and a forecast for the upcoming season.

a. What percentage of your system throughput is local production/landfill/renewable gas?

In 2024, RNG made up 2% of total system throughput. This is expected to increase to approximately 3% in 2025 based on year-to-date information.

b. Provide a project description of any new RNG facilities that were attached during the twelve months prior to May 1, 2025, and any actively being planned for your service areas.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. Please indicate the status of communications currently underway with any renewable gas/biogas developers including their names and locations of the potential project(s).

[REDACTED]

d. Describe what process and procedures are in place to ensure gas quality parameters are met prior to flowing into your distribution system. Which processes are in place to verify that btu content is met by RNG producers?

We have established a Gas Quality Standard that is incorporated in the Interconnect Agreements we enter with each developer. Each RNG station contain analytical equipment to verify btu content and other constituents of concern.

e. Does your Company have a standardized interconnection agreement and gas quality requirements as part of a tariff and/or GTOP? If so, provide the cite.

Yes, the link is: <https://www.stlawrencegas.com/wp-content/uploads/2022/10/Liberty-Utilities-St.-Lawrence-Gas-Corp.-GTOP-2021-Final-10.4.2021.pdf>

25. Are there parts of your service territory, or facilities operated by another entity, that could be impacted, including outages, related to poor performance from an RNG, biofuel, or other local production facility? If so, provide details of each location and the controls in place to ensure reliability of the system.

No, poor performance of RNG facilities would not impact our service territory. All RNG facilities inject into pipelines which are also supplied by other gate stations.

26. Are you currently studying, or plan to study, the use of hydrogen in your distribution system? If so, provide details of each program or project.

Yes, we have completed a preliminary study into the use of hydrogen in our system. Further investigation will be completed in the future. We have complete a pilot project to blend hydrogen into the gas system downstream of our meter at the Liberty Utilities facility in Massena, NY.

27. Table 8: Bill impact comparison of last winter (2024-2025) versus the forecasted 2025-2026 winter. Include the work papers used to develop Table 8 (note: they should also tie to the numbers in Table 7).

See Table 8 in the attached workbook entitled “Case 25-M-0183 – Winter Supply 2025-26 Forms OCT UPDATE FINAL.xlsx”

As discussed in the cover letter, the updates to your filings will be required within the first week of the months September through November. Each monthly update requires any changes to your filing questions and tables reports. We will be using the Table 8 from your October updates to provide the Commission with the latest available information at its **October Session**, so please be timely with your updates. Also, provide an updated Table 8 by **February 10, 2026**, incorporating the contract closing for January deliveries. Thank you again for your continued assistance with this statewide effort.