

**EXHIBIT 8**  
**SUMMARY OF COMPLIANCE**

**LEATHERSTOCKING GAS COMPANY, LLC**

**SUMMARY OF COMPLIANCE WITH REQUIREMENTS  
FOR OBTAINING A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY  
AND TO EXERCISE FRANCHISES**

The following is a list of the requirements of the Public Service Law (Section 68) and regulations thereunder (16 NYCRR Parts 17 and 21) pertaining to applications to the Public Service Commission for certificates of public convenience and to exercise franchises granted by municipalities. The specific purpose of this list is to identify where, in the materials filed by Leatherstocking Gas Company, LLC in the instant proceedings, each of the relevant requirements is addressed and complied with. (It should be noted that certain requirements appear in both the Public Service Law and the regulations thereunder. Where such is the case, responses are cross-referenced.)

<b><u>Requirement</u></b>	<b><u>Response/Reference</u></b>
<b>PSL §68(1) (Certificate of Public Convenience and Necessity)</b>	
• “certified copy of the charter of such corporation shall be filed in the office of the commission”	Petition, Sch. A
• “verified statement of the president and secretary of the corporation, showing that it has received the required consent of the proper municipal authorities”	Petition, Sch. D; see also Petition, Sch. B (Franchise Agreement between Petitioner and Town of Windsor), Sch. C (Franchise Agreement between Petitioner and Village of Windsor)
• “economic feasibility of the corporation”	Dir. Test’y, pp. 7-8, 10-17; Ex. 4, 5; Supp. Dir. Test’y, pp. 11-12
• “corporation’s ability to...”	
○ “finance improvements of a gas plant”	Dir. Test’y, pp. 16-17; Case 15-G-0128, Petition for Authority to Issue Long-Term Debt (2/27/15); Supp. Dir. Test’y, pp. 5-6
○ “render safe, adequate and reliable service”	Dir. Test’y, pp. 6-9; Supp. Dir. Test’y, pp. 12-14, Ex. 7
○ “provide just and reasonable rates”	Dir. Test’y, pp. 14-15; Ex. 4, 5; Supp. Dir. Test’y, pp. 7-8
• “issuance of a certificate is in the public interest”	Dir. Test’y, pp. 8-13, 15, 17-18; Supp. Dir. Test’y, pp. 8-18
<b>16 NYCRR Part 17 (Matters Relative to All Applications)</b>	
• §17.2: “certified copy of the certificate of incorporation of every corporation directly interested in presenting the petition together with a certified copy of each amendment to such certificate”	Petition, Schedule A; Supp. Dir. Test’y, pp. 3-5

<u>Requirement</u>	<u>Response/Reference</u>
<ul style="list-style-type: none"> <li>• §17.3: “petition shall contain such further information as required by law or by rules of the commission and shall set forth in detail that compliance has been had with such requirements”</li> </ul>	Supp. Dir. Test’y, pp. 17-18; Ex. 8
<ul style="list-style-type: none"> <li>• §17.5: “originals of all books, papers and documents which may be required”</li> </ul>	[Cited by Staff 3/18/15 letter to request financial statements] Supp. Dir. Test’y, pp. 5-6; Case 15-G-0128, Petition for Authority to Issue Long-Term Debt (2/27/15)
<b>16 NYCRR Part 21 (Gas, Electric, Steam, Waterworks, Telegraph and Telephone Corporations and Municipalities)</b>	
<ul style="list-style-type: none"> <li>• §21.2 (Rules applicable to all petitions)</li> </ul>	
<ul style="list-style-type: none"> <li>○ (a): “names of all corporations, including municipalities, rendering the kind of service for which the petitioner requests authority in the territory covered by the application”</li> </ul>	Dir. Test’y, pp. 4-5
<ul style="list-style-type: none"> <li>○ (b): “certified copy of the franchise . . . , with a verified statement by a responsible official of the petitioner that all municipal consents have been secured that are required by law”</li> </ul>	Petition, Sch. B (Franchise Agreement between Petitioner and Town of Windsor); Sch. C (Franchise Agreement between Petitioner and Village of Windsor); Sch. D (Verified Statement)
<ul style="list-style-type: none"> <li>• §21.3 (Evidence to be presented at hearing; “the applicant shall be prepared to show by competent evidence:”)</li> </ul>	
<ul style="list-style-type: none"> <li>○ (a): “Description and population of the territory within which it proposes to exercise authority granted by the franchise . . . , including the names of all cities, towns and villages; also the dates when construction will begin and service will be provided”</li> </ul>	Dir. Test’y, pp. 4 (population); Supp. Dir. Test’y, pp. 14-15 (schedule)
<ul style="list-style-type: none"> <li>○ (b): “Description of the plant and system to be constructed and the estimated cost thereof”</li> </ul>	Dir. Test’y, pp. 2-7, 10; Ex. 1, 2, 4, 5
<ul style="list-style-type: none"> <li>○ (c): “The manner in which the cost is to be financed”</li> </ul>	Dir. Test’y, pp. 16-17; Case 15-G-0128, Petition for Authority to Issue Long-Term Debt (2/27/15); Supp. Dir. Test’y, pp. 5-6
<ul style="list-style-type: none"> <li>○ (d): “The rates to be charged for the classes of service rendered”</li> </ul>	Dir. Test’y, pp. 14-15; Ex. 4, 5; Supp. Dir. Test’y, pp. 7-8
<ul style="list-style-type: none"> <li>○ (e): “Estimated revenues to be derived from operations covered by the petition, and the estimated expenses of such operations, each to be complete and in detail for each of the first three years of service; also estimate made from an actual</li> </ul>	Dir. Test’y, pp. 9-17; Ex. 4, 5; Supp. Dir. Test’y, pp. 7-11

<u>Requirement</u>	<u>Response/Reference</u>
<p>survey of the territory of the number of prospective customers at the end of the first, second and third years of service showing for each date the number of prospective customers in the residential, commercial and industrial classes of service”</p>	
<p>○ (f): “The facts upon which it relies to entitle it to exercise the rights and privileges petitioned for, including evidence of the economic feasibility of the enterprise, proof of the applicant’s ability to finance the project and to render adequate service and that the proposal is in the public interest”</p>	<p>Feasibility: Dir. Test’y, pp. 7-8, 10-17; Ex. 4, 5; Supp. Dir. Test’y, pp. 10-12</p> <p>Finance: Dir. Test’y, pp. 16-17; Case 15-G-0128, Petition for Authority to Issue Long-Term Debt (2/27/15); Supp. Dir. Test’y, pp. 5-6</p> <p>Service: Dir. Test’y, pp. 6-9; Supp. Dir. Test’y, pp. 12-14; Ex. 7</p> <p>Pub. Interest: Dir. Test’y, pp. 8-13, 15, 17-18; Supp. Dir. Test’y, pp. 8-18</p>