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- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

)	
)	Docket No. 18-057-01
In the Matter of the Dominion Energy)	
Utah's Integrated Resource Plan (IRP) for)	DOMINION ENERGY UTAH'S
Plan Year: June 1, 2018 to May 31, 2019)	REPLY COMMENTS
)	
)	

Questar Gas Company dba Dominion Energy Utah (Dominion Energy or the Company) respectfully submits these Reply Comments in the above-referenced docket.

BACKGROUND

On June 14, 2018, the Company filed its 2018-2019 Integrated Resource Plan (IRP) for the planning period of June 1, 2018 to May 31, 2019. On June 27, 2018, the Utah Public Service Commission (Commission) issued a Scheduling Order which set a deadline of September 14, 2018 for parties to file initial comments. On September 14, 2018 the Utah Division of Public Utilities (Division) filed an Action Request Response (Division's Response) and the Utah Office of Consumer Services (Office) filed a Memorandum (Office's Memorandum) regarding the Company's 2018-2019 IRP. The Company respectfully submits this Reply in response to the Division's Response and the Office's Memorandum.

REPLY TO DIVISION'S RESPONSE

In its Action Request Response, the Division concludes that “the Company has made reasonable attempts to satisfy the 2009 IRP guidelines and has also committed, through continuing discussions with parties, to continue to improve on details of some aspects presented in this IRP. Therefore the DPU recommends the PSC acknowledge the 2018-2019 IRP as filed in Docket No. 18-057-01.” The Company appreciates the Division’s and the Office’s willingness to engage in dialogue and collaboration and will continue to incorporate comments and suggestions each offer with regard to future IRPs and to the IRP process.

THE OFFICE'S MEMORANDUM

In its Memorandum, the Office provided comments and recommendations on four topics: 1) Improvements to report formatting; 2) Cost-of-service gas requirements for 2020; 3) Increasing integrity management costs; and 4) Compliance with the 2009 Integrated Resource Planning Standards and Guidelines (2009 IRP Guidelines).

Improvements to Report Formatting

With regard to the Improvements to report formatting, the Company appreciates the Office’s comments and agrees that the new IRP structure is an improvement. DEU looks forward to working with the Office and other interested parties to further improve the format of future IRPs.

Cost-of-Service Gas Requirements for 2020 and Increased Integrity Management Costs

The Office expressed concern about the Company’s obligation to reduce its reliance on Cost-of-Service gas by 2020 and the increases in Integrity Management Costs. While the

Office does not suggest that the Company has acted improperly, the Office indicated that it will monitor both issues. Again, the Company welcomes the Office's input and collaboration on both issues and will work with the Office to ensure that interested parties are aware of new developments.

Compliance with IRP Guidelines

The Office's final concerns relate to the adequacy of information provided in the DNG Action Plan section of the IRP. The Office recommends that the Commission "require DEU to: 1) provide additional detail and supporting analysis on IRP-selected projects and services in order to be in compliance with the IRP standards and guidelines that require the Company to provide alternatives, costs, benefits, risks, and reasoning, and 2) follow the Commission order regarding confidential information to ensure regulatory stakeholders are given access to such information during the IRP process." These recommendations arise as a result of two perceived shortcomings.

First, the Office believes that the Company should not incorporate data and detail into the current IRP by referring to past IRPs. Though the Company believes that it is appropriate to incorporate detail by reference, it recognizes that doing so may be unnecessarily cumbersome. The Company appreciates this feedback and commits to provide complete information in future IRP documents, rather than referring the reader to earlier IRPs.

The Office also contends that the Company failed to include sufficient detail about its planned Liquefied Natural Gas (LNG) facility. The Company believes that it has provided an appropriate level of detail related to the proposed LNG facility, and that the IRP is fully compliant with the 2009 IRP Guidelines.

Section 5 of the 2018-2019 IRP document contains a summary description of the proposed LNG facility and refers specifically to the Application, accompanying testimony and exhibits filed in Docket No. 18-057-03. These materials are comprehensive and contain far more detail than that required by the 2009 IRP Guidelines. As noted above, the Company recognizes that incorporating other materials by reference is inconvenient and cumbersome and commits to including complete information in future IRPs instead of incorporating such information by reference. That said, the Company maintains that the 2018-2019 IRP fully complied with the requirements of the 2009 IRP Guidelines.

The Company also notes that the IRP is a document that is read by parties with a wide variety of interests. While the Company is committed to including information sufficient to comply with the requirements of the 2009 IRP Guidelines, it observes that creating an IRP document that is comprised of highly technical engineering and financial information puts it at cross-purposes with the goal of having a more readable document that informs a broader group of individuals. The Company is committed to making detailed information available to interested parties like the Office and the Commission's discovery process provides a mechanism for it to do so.

This discovery process is also ideally suited for the exchange of confidential information. The Office acknowledges that the Company need not disclose such information in the IRP, and that existing processes ensures that the Office or any other interested party can obtain all necessary information to ensure that regulatory review is thorough. The Company believes it can usually include information sufficient to comply with the 2009 IRP Guidelines without disclosing detailed confidential information. However, if doing so is not possible, the Company will utilize the tools available in Utah Admin. Code R746-1-601 *et seq.*

Additionally, Dominion Energy will provide confidential information in response to data requests, should parties like the Office seek a greater level of detail.

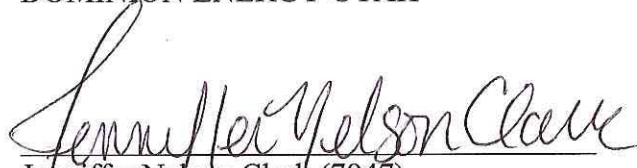
CONCLUSION

The Company requests that the Commission acknowledge the 2018-2019 IRP as recommended by the Division. The Company will provide the additional information as indicated herein. The Company will continue to work with the Division and Office and other interested parties to improve its IRP process and future filings.

Dated this 12th day of October, 2018.

Respectfully submitted,

DOMINION ENERGY UTAH



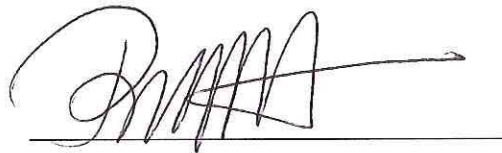
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CERTIFICATE OF SERVICE

This is to certify that a copy of Questar Gas Company's Reply Comments, in Docket

No. 18-057-01, was sent by electronic mail on October 12, 2018, to the following:

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A handwritten signature in black ink, appearing to read 'Michele Beck', is written over a horizontal line.