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## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

DOMINION ENERGY UTAH'S INTEGRATION PROGRESS REPORTS FOR 2018

Docket No. 18-057-09

## DOMINION ENERGY UTAH'S REPLY COMMENTS

Pursuant to the Notice of Filing and Comment Period issued on August 2, 2018 in the above-referenced docket, Questar Gas Company dba Dominion Energy Utah (Dominion Energy Utah or Company) respectfully submits these Reply Comments.

On August 1, 2018, Dominion Energy Utah filed its First Quarter 2018 Integration Progress Report. On August 2, 2018, the Commission issued the Notice of Filing and Comment Period requiring any comments to be filed by Tuesday October 9, 2018 and any reply comments to be filed by Tuesday October 23, 2018.

On October 10, 2018, the Utah Division of Public Utilities (Division) filed its Recommendation (Division's Recommendation) in this docket finding that "the Company has materially met its requirements to report to the Commission its merger progress as required in paragraph 36 of the Stipulation and no action is requested or required of the Commission." Division's Recommendation at p. 4. The Company agrees with these findings and recommendations.

However, the Division also offered commentary related to another matter, that was addressed in Docket No. 18-057-07. Specifically, the Division suggests that "the Commission's

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decision in Docket No. 18-057-07 . . . and the resultant order shows that Gas Utility failed to keep Merger commitment #7." Division's Recommendation at p. 3. Merger Commitment #7 provides that:

Dominion Questar Gas will be managed from an operations standpoint as a separate regional business under Dominion with responsibility for managing operations to achieve the objectives of customer satisfaction; reasonable rates; reliable service; customer, public, and employee safety; environmental stewardship; and collaborative and productive relationships with customers, regulators, other governmental entities, and interested stakeholders. Dominion Questar Gas will have its own local operating management located in Salt Lake City, Utah.

Settlement Stipulation, Docket No. 16-057-01, ¶ 7, as approved in Order Memorializing Bench Ruling Approving Settlement Stipulation dated September 14, 2016.

The Company disagrees with this commentary and conclusion. The Commission has made no finding related to the merger commitment identified in the Division's Recommendations. In fact, in its Report and Order in Docket No. 18-057-07 issued on October 4, 2018, the Commission made findings and an order directed at Dominion Energy Utah, for actions taken by Dominion Energy Utah. It made no finding and issued no order relating to Docket No. 16-057-01 or the Settlement Stipulation filed and approved in that docket. Accordingly, there is no Commission Order, nor is there evidence in the Division's Recommendation, that supports the assertion that the Company violated any provision of the Settlement Stipulation in Docket No. 16-057-01.

Based on the foregoing, the Company agrees that the Commission need take no further action at this time relating to the Integration Progress Report.

RESPECTFULLY SUBMITTED this 23<sup>rd</sup> day of October, 2018.

DOMINION ENERGY UTAH

Jenniffer Nelson Clark

Attorney for Dominion Energy Utah

## CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of Dominion Energy Utah's Reply Comments Information was served upon the following persons by e-mail on October 23, 2018:

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