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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
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Pursuant to the Notice of Filing and Comment Period issued on October 25, 2018 in the above-referenced docket, Questar Gas Company dba Dominion Energy Utah (Dominion Energy Utah or Company) respectfully submits these Reply Comments.

On October 24, 2018, Dominion Energy Utah filed its Second Quarter 2018 Integration Progress Report. On October 25, 2018, the Commission issued the Notice of Filing and Comment Period requiring any comments to be filed by Tuesday November 27, 2018 and any reply comments to be filed by Tuesday December 11, 2018.

On November 9, 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." The Company agrees with these findings and recommendations.

However, the Division also offered commentary which requires some

clarification. The Division comments that “many areas of Customer Service are slipping (albeit slowly) at the Gas Utility”. The Division accurately acknowledges the cause; that the Company is currently understaffed in its Customer Care department. The Company is currently understaffed by ten employees and is in the process of hiring to fill those vacancies. But the Division also comments that “it is not clear if the under-staffed situation in the customer service department is related to the merger or some other reason”. Therefore, the Company seeks to clarify that issue.

The under-staffed situation is not related to the merger but is related to other factors, including Customer Care employees moving to other departments and a tight labor market. While the management in the Customer Care department has remained stable since the merger, the overall average rate of attrition in the Customer Care department YTD in 2018 is 23.2%. Unemployment is at record lows in Utah it and, due to increased competition in the labor market, it is increasingly difficult to hire and retain employees. Also, as vacancies open up in other areas of the Company the Customer Care department is a natural area to draw from to fill those vacancies as employees seek opportunities for career progression within the Company. Since the merger there have been no hiring restrictions placed on the Customer Care department. Given these circumstances, the very slight dip in the customer care standards is actually representative of exceptional customer service from the currently shorthanded and less experienced employees in that department.

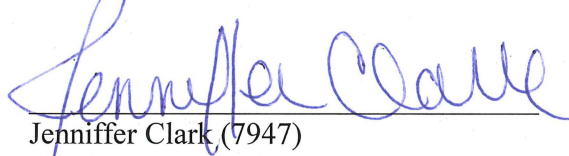
The Division also suggests, without factual basis, that in Docket No. 18-057-07, the Company “behaved in a way that suggests to the Division that it had greater concern for its affiliate than for customers.” The Company disagrees with this

statement and observes that the Commission has already made a final determination in this docket based on the presented evidence. The Company has fully complied with its obligations set forth in the Order Memorializing Bench Ruling Approving Settlement Stipulation in Docket No. 16-057-01, and the accompanying Settlement Stipulation. The Company looks forward to working with the Division in the future to address this or any other concern the Division may have.

Finally, the Company agrees with the Division's recommendation 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 that the Commission need take no further action at this time relating to the Integration Progress Report.

RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of December, 2018.

DOMINION ENERGY UTAH



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## CERTIFICATE OF SERVICE

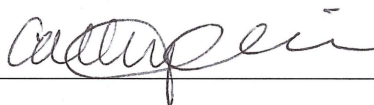
This is to certify that a true and correct copy of Reply Comments was served upon the following persons by e-mail on December 11, 2018:

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