- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

Dominion Energy Utah's Integrated Resource Plan (IRP) for Plan Year: June 1, 2019 to May 31, 2020	DOCKET NO. 19-057-01 REPORT AND ORDER

ISSUED: January 16, 2020

On June 13, 2019, Dominion Energy Utah (DEU) filed its 2019 integrated resource plan for the plan year of June 1, 2019 through May 31, 2020 ("2019 IRP") with the Public Service Commission of Utah (PSC).[1] The Division of Public Utilities (DPU) and the Office of Consumer Services (OCS) each filed comments on September 17, 2019. On October 15, 2019, DEU and the OCS filed reply comments.

I. SUMMARY OF THE 2019 IRP

The 2019 IRP presents DEU's plan to meet, provide infrastructure for, and manage its ongoing natural gas demand.

DEU submits the following key forecasts for the 2019 IRP year:

(1) DEU forecasts a Design-Peak Day firm sales demand of approximately 1.220 million decatherms (MMDth) at the city gates for the 2019-2020 heating season;[2]

(2) DEU forecasts a cost-of-service gas production level of approximately 65.9 MMDth, assuming the completion of new development drilling projects (56 percent of forecast demand);

[1] DEU's annual IRP is filed pursuant to the PSC's Report and Order on Standards and Guidelines for Questar Gas Company, issued March 31, 2009, *In the Matter of the Revision of Questar Gas Company's Integrated Resource Planning Standards and Guidelines* ("2009 Standards and Guidelines"), Docket No. 08-057-02. Questar Gas Company is now Dominion Energy Utah.

[2] DEU's firm sales design day scenario is based on 70 heating degree days in the Salt Lake region; mean daily wind speed of 9.5 mph as measured at the Salt Lake City Airport weather station; and the day is not a Friday, Saturday, Sunday, or a winter holiday.

(3) DEU forecasts a balanced portfolio of gas purchases of approximately 56.7 MMDth;

(4) DEU forecasts its transmission and distribution integrity management programs (TIMP and DIMP) will cost $10.5 million in 2019 ($8 million for TIMP and $2.5 million for DIMP), $11 million in 2020 ($9.3 million for TIMP and $1.7 million for DIMP), and $10 million in 2021 ($8.3 million for TIMP and $1.7 million for DIMP);

(5) DEU does not forecast a current need for additional price stabilization but will review this on an annual basis to determine whether such measures are appropriate in the future;

In addition, DEU identifies the following commitments arising out of the IRP process:

(1) DEU will maintain flexibility in purchase decisions pursuant to the planning guidelines listed in the IRP because actual weather and load conditions will vary from assumed conditions in the modeling simulation;

(2) DEU will continue to monitor and manage producer imbalances;

(3) DEU will continue to promote cost-effective energy-efficiency measures;

(4) DEU will enter into contracts to serve peak-hour requirements and to secure needed storage and transportation capacity;

(5) DEU will take the necessary steps to obtain required approvals for the design and construction of an on-system liquefied natural gas (LNG) facility to promote system reliability for customers; and

(6) DEU is fully committed to meeting its customers' energy needs in an environmentally responsible and proactive manner; DEU commits to meeting or going beyond basic obligations to comply with applicable environmental laws and regulations.

The 2019 IRP presents DEU's annual forecasts, summaries of system and gas modeling activities, and resource selection results. It also includes a discussion of regulatory, resource, and operational challenges that DEU faced during the previous year or could face in the future.

The following tables summarize price, sales, peak demand, throughput, and usage per customer information provided in the 2019 IRP. For comparison, historic information is provided where available:

Table 1. Price ($/Dth) (2019 IRP at 8-1:8-2; 2018 IRP at 8-1)

Actual First of Month Index Price for Natural Gas on Dominion Questar Pipeline			
Annual average price (January – December)	2018: $2.63	2017: $2.74	2016: $2.24
Heating season average price (November – March)	2018-2019: $4.06	2017-2018: $2.57	2016-2017: $2.95

Note: DEU forecasts a price of approximately $2.79 per Dth for the 2019-20 heating season.

Table 2. Sales (MMDth)
(2019 IRP at 3-1, Exhibit 3.10; and 2018 IRP at 3-1, Exhibit 3.10)

Annual System Sales	2019 IRP Forecast 2019/20-2028/29	2018 IRP Forecast 2018/19-2027/28	2018 Actual
Temperature-adjusted sales[3]	117.4 – 128.4	115.2 – 122.2	116
Actual sales			104

Table 3. Peak Demand (MMDth/day) (2019 IRP, Exhibit 3.9; and 2018 IRP, Exhibit 3.9)

Peak Demand at the City Gate	2019 IRP Forecast Heating Season 2019-20	2018 IRP Forecast Heating Season 2018-19	Actual Heating Season 2018-2019
Total	1.698	1.799	1.212
Firm Sales	1.220	1.330	0.892
Transportation	0.478	0.469	0.320

Table 4. System Throughput (MMDth)
(2019 IRP at 3-2, Exhibit 3.10; and 2018 IRP at 3-2, Exhibit 3.10)

System Throughput	2019 IRP Forecast 2019/20-2028/29	2018 IRP Forecast 2018/19-2027/28	2017/2018 Actual
Temperature-adjusted system throughput	208.5 – 220.8	202.7 – 214.3	194
Actual system throughput			182

[3] The projections contained in the IRP reflect the temperature and elevation compensation the PSC approved in its Report and Order, issued June 3, 2010, *In the Matter of the Application of Questar Gas Company to Increase Distribution Non-Gas Rates and Charges and Make Tariff Modifications*, Docket No. 09-057-16.

Table 5. Usage per Customer (Dth) (2019 IRP at Section 3, Exhibits 3.1 – 3.11 – System GS Customers (Excel), Worksheet: UPC Data)

Temperature Adjusted Average Annual Usage per Customer (IRP Year)	2019 IRP Forecast 2019/20-2028/29	2018 IRP Forecast 2018/19-2027/28	2018 Actual (May)
Utah GS	104.5 – 95.8	104.6 – 92.8	107.5
Utah Residential GS	80.5 – 73.8	80.8 – 72.6	82.1
Utah Commercial GS	442.3 – 413.3	436.0 – 383.4	459.0

Table 6. Natural Gas Supply Requirements (MMDth) (2019 IRP at Pages 14-5:14-6; Exhibits 14.85:14.90)

Natural Gas Supply Requirement	2019 IRP Forecast June 2019 – May 2020	2018 IRP Forecast June 2018 – May 2019
Total	138.2	136.1
Cost-of-Service Gas	65.9	70.6
Purchased Gas	56.7	49.7
Other (storage)	15.6	15.8

Note: Actual cost-of-service gas supply for the 2018 calendar year was 73.3 MMDth measured at the wellhead compared to 69.5 MMDth during the 2017 calendar year.[4]

DEU is also planning, designing, and constructing several reinforcement and replacement projects or programs. These projects include twelve high pressure station projects, three feeder line projects — one of which is its Utah Feeder Line Replacement Program, and two intermediate high pressure programs (Belt Main Replacement Program and the Aging Infrastructure not included in the Infrastructure Tracker Replacement Program). DEU also identifies and discusses two southern system expansion projects, and an on-system LNG facility. DEU provides an update on its transponder replacement project with an estimated completion date of mid-2020, at a cost of $70 million.

[4] 2019 IRP at 9-2.

II. PARTIES' COMMENTS

The DPU

The DPU provides comments on the following sections of the 2019 IRP: Section 3 – Customer and Gas Demand Forecast;[5] Section 4 – System Capabilities and Constraints; Section 5 – Distribution System Action Plan; Section 6 – Integrity Management; Section 8 – Purchased Gas; Section 9 – Cost-of-Service Gas; Section 11 – Supply Reliability; Section 13 – Energy-Efficiency Programs; and Section 14 – Final Modeling Results.

Based on its review, the DPU provided recommendations on the following IRP topics:

1. Lost and Unaccounted for Gas (LAUF):
    a. When dramatic changes occur pertaining to LAUF, DEU should explain not only the cause of the large increases but also DEU's remediation plans and benchmark; and
    b. DEU should provide a comparison of its LAUF amounts with those of other similarly situated natural gas utilities.
2. System Supply Analysis and Joint Operating Agreement (JOA) with Dominion Energy Questar Pipeline (DEQP): DEU should provide its reasons and justification for relying on the JOA in specifying its needs from DEQP and the reasons those differ from the other pipelines (quantitatively) that serve its system.
3. High Pressure Projects: DEU should provide:
    a. clear definitions of the terms used in the IRP, for example, the distinction between the terms "regulator station" and "gate station," perhaps by providing a glossary of terms; and
    b. more precise explanations in the Action Plan, for example, the term "operational concern" should be more precise.
4. Intermediate High Pressure Projects: DEU should provide a clear separation of the different mileages discussed in the IRP.

[5] The DPU identified the following corrections related to the 2019 IRP: (1) Page 3-3 of the 2019 IRP, *i.e.*, the word "decreased" should be replaced with "increased" in the following sentence "Annual demand among electric generation customers *decreased* over the prior year by about 43% in 2018;" and (2) the 2019 IRP should direct readers looking for the SENDOUT model results to Exhibit 13.1, not 12.1. We conclude DEU's October 15, 2019 Reply Comments adequately address these inconsistencies.

5. Rural Expansion: DEU should separate out this expansion in the Quarterly IRP Variance Reports such that a clear cost/benefit of future plans is demonstrated.
6. Key Performance Integrity Metrics: DEU should provide an explanation of the reason for such a wide variation in the High Consequence Area Miles Assessed and Anomalies Repaired per year presented on page 6-6, Table 6.1.
7. COS Gas Production Shut-Ins:
    a. DEU should compare on a detailed basis the cost to shut in COS Gas versus purchasing gas supplies, showing what wells are being shut-in and what the attendant customer benefits are, similar to Table 9.1; and
    b. where actual shut-ins differ significantly from previous forecasts, DEU should provide detail of the attendant benefits and costs.
8. Weather and Demand Modeling Results: DEU should provide a comparison of the SENDOUT's peak demand versus DEU's Peak-Day forecast as shown on page 3-1 to compare and contrast the two forecasting methods or results.

The DPU also notes that, contrary to Ordering Paragraph 3 of the PSC's Report and Order, issued January 5, 2018, in Docket No. 17-057-12,[6] DEU did not provide specific information related to the LNG facility in the 2019 IRP. The DPU observes, moreover, the PSC's IRP Order, issued November 19, 2018, in Docket No. 18-057-01,[7] found that future IRPs should provide complete information rather than incorporating information by reference. Nevertheless, the DPU indicates DEU incorporated sensitivity and other analyses pertaining to the LNG Facility into the 2019 IRP by reference to a separate but concurrent docket. As such, the DPU advises the 2019 IRP filing generally adheres to PSC orders and that the 2009 IRP Guidelines have been sufficiently met, though the DPU requests the PSC provide further clarification on whether duplicative information should be filed in two or more open dockets now or in the future. Accordingly, the DPU recommends the PSC acknowledge the 2019 IRP.

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[6] *Dominion Energy Utah's Integrated Resource Plan (IRP) for Plan Year: June 1, 2017 to May 31, 2018*, Docket No. 17-057-12.

[7] *Dominion Energy Utah's Integrated Resource Plan (IRP) for Plan Year: June 1, 2018 to May 31, 2019* (Report and Order issued November 19, 2018 at 9-10); Docket No. 18-057-01.

The OCS

The OCS provided recommendations in comments and reply comments pertaining to COS Gas requirements for 2020, the new Sustainability section in the 2019 IRP, DEU's proposed high-pressure corridor, anticipated rural expansion, DEU's transponder replacement program, COS Production Gas Shut-Ins, and Design Peak Day planning reserve margin. In comments, the OCS recommends the PSC require DEU address the following in future IRP filings:

1. Sustainability:
    a. clarify how the sustainability goals of its parent company will be measured in the DEU market and what actions it will take locally to meet its goals;
    b. provide additional detail and supporting analysis on discussed renewable natural gas (RNG) projects, including a full report of DEU's affiliation to these projects; and
    c. ensure that only DEU-affiliated project outcomes are counted in sustainability measures.
2. High Pressure Corridor: provide additional detail and supporting analysis on its high-pressure corridor plans.
3. Rural Expansion: provide additional detail and supporting analysis on its planned expansion to rural communities, including how these projects would adhere to statutory revenue requirement limits.
4. Ongoing IRP Topics: provide updated and complete information for ongoing topics addressed in the IRP, at a minimum pointing to relevant proceedings if not including a more comprehensive description in the IRP itself.
5. IRP Technical Conference Information: ensure issues discussed in IRP technical conferences are also included and adequately discussed with appropriate detail in the IRP document.
6. COS Gas Shut-Ins: provide an explanation in the IRP as to why actual shut-ins differed from the forecasted amount.
7. SENDOUT Model versus Design Day Forecast: provide a comparison of the forecasted SENDOUT amounts (*i.e.*, "Supply Stack") for the last IRP Design Peak Day compared with the actual peak demand day for that IRP year in all future IRPs.
8. Design Peak Day Supply: provide a more robust explanation and evaluation of peak day supply and its interaction with other risk mitigation strategies in DEU's next IRP.

III. DEU's REPLY COMMENTS

DEU's responsive comments to issues raised by the DPU and the OCS in this proceeding are summarized as follows:

1. LAUF: DEU explains that variations in LAUF can be caused by variables related to the estimation techniques available to DEU, rather than an actual volumetric amount. Accordingly, DEU maintains percentage-basis accounting for LAUF is the appropriate metric to gauge associated risks. As support, DEU offers that, on a percentage-basis, LAUF was estimated to be approximately 0.5 percent of total system distributed volumes, consistent with DEU's forecast expectations.
2. System Supply Analysis and JOA with DEQP: DEU states there are Facilities Agreements between it and some of the pipelines interconnected to the DEU distribution system that define operating parameters (*i.e.*, minimum operation pressures, flows, etc.). Because some of the DEQP-DEU interconnection points had been established previously as part of an integrated distribution system with no such attendant written agreements, DEU represents the JOA serves to address those operational parameters for all DEQP-DEU interconnecting points.
3. High Pressure and Intermediate High Pressure Projects:
    a) DEU commits it will define relevant terms in future IRPs;
    b) DEU commits to providing in future IRPs more precise explanations attendant to the DNG Action Plan section;
    c) In addition to providing the required level of detail for projects falling within the three-year time frame set forth in the 2009 IRP Guidelines, DEU commits it will include in future IRPs an additional subsection labeled "Long-Term Planning" within the "System Capacity and Constraints" section of the IRP to provide a general outline of demand growth trends or any known future projects beyond the scope of the DNG Action Plan. DEU adds it is limited in the specificity of information (*i.e.*, scheduling of projects) it can provide given these long-term plans are generally demand-growth based, and may be canceled or delayed due to other factors that affect system pressures and capacities; and
    d) DEU states the discrete 58-mile section of 1929-39 vintage IHP main is not a "belt main" and thus is excluded from the Infrastructure Rate Adjustment.
4. Rural Expansion: DEU believes that summary-level information of any planned rural expansion is appropriate for inclusion in the IRP and recommends providing any detailed information in a separately defined docket established as a means to review the purpose and prudence of a given rural expansion project. Related to this, DEU states in response to the OCS's comments that DEU had not selected any rural

expansion projects pursuant to Utah Code Ann. §§ 54-17-401 through -403 as of the 2019 IRP's filing, and commits to providing summary-level information within future IRPs while reserving greater detail for any separate filings attendant to the approval of any such projects.

5. Key Performance Integrity Metrics: DEU states a strategic process of grouping pipes planned for inspection, in conjunction with the location and length of pipes associated with its Inline Inspections and External Corrosion Direct Assessment processes, contribute to the variability of High Consequence Area Miles Assessed and Anomalies Repaired per year.

6. Gas Supply – COS Production versus Purchased: DEU states the Quarterly IRP Variance Reports currently provide information and analysis showing how DEU manages instances when actual shut-ins of COS Production Gas vary significantly from forecast shut-ins. Contrary to the DPU's recommendation, DEU states it does not believe a cost-benefit analysis comparing Purchased Gas against COS Production Gas is appropriate for inclusion in IRPs. DEU offers that if the PSC finds this information should be provided, that it would prefer the information reside in the IRP Quarterly Variance Reports.

7. Sustainability:
    a) DEU states it plans to make clear DEU's involvement in sustainability projects in the future, how DEU's emission reduction targets relate to the Utah-specific Dominion Energy Inc. market, and whether DEU has specific targets or plans related to the new corporate sustainability goals;
    b) DEU commits to provide details for any Sustainable Transportation Energy Plan (STEP) projects if or when DEU determines it will pursue PSC approval;
    c) DEU states it does not have any direct affiliation with the companies that are advancing the projects identified in the 2019 IRP February 20, 2019 Technical Conference; and
    d) DEU states the four RNG projects inquired of in the OCS's comments were listed in the 2019 IRP as potential projects that may add renewable gas to the DEU system, yet viability of those projects has not been determined and DEU has not produced any related cost estimates.

8. Ongoing IRP Topics: DEU agrees with the OCS that full or robust inquiries into ongoing issues presented in IRPs be reserved in separate proceedings for full and robust inquiry.

9. Weather and Demand: DEU states a comparison of SENDOUT's peak demand versus DEU's Design Peak Day forecast is unnecessary because the SENDOUT Model uses the peak-day demand forecasted in 2019 IRP Section 3-1 to determine if the resources will be available to meet the demand requirements on a Design Peak Day.

IV. DICUSSION, FINDINGS, AND CONCLUSIONS

DEU's IRP process is an open, public process through which all relevant supply and demand-side resources are investigated to effect the optimal set of resources to meet its current and future natural gas service needs at the lowest total cost (to the utility and its customers), in a manner consistent with the long-run public interest and safety, given the expected combination of costs, risks, and uncertainty. Pursuant to the 2009 Standards and Guidelines, we consider comments on the adequacy of the 2019 IRP process, and the information presented in the 2019 IRP.

The DPU and DEU recommend the PSC acknowledge the 2019 IRP, which no party opposes.

We find reasonable or satisfactory the clarifications presented in DEU's Reply Comments pertaining to LAUF, the nature of the interconnect agreements related to the DEU-DEQP JOA, the Integrity Management Program's Key Performance Integrity Metrics, and the Design Day estimate's interaction with the SENDOUT Model's forecast results. Additionally, we find commitments contained in DEU's Reply Comments adequately address those concerns raised in the DPU's and the OCS's comments related to the High Pressure and Intermediate High Pressure Projects sections of the IRP, provision of detailed plans for potential projects related to local and corporate sustainability goals, or any potential project plans pursuant to Utah Code Ann. §§ 54-20-105 (*i.e.*, STEP), and the provision of any potential plans for distribution expansion in rural areas.

SENDOUT Model's Forecast Peak Day Demand versus Actual Peak Demand

The OCS requests that DEU provide a comparison of the forecasted SENDOUT amounts (*i.e.*, "Supply Stack") for the last IRP Design Peak Day compared with the actual peak demand day for that IRP year in all future IRPs. Section II.B. of the 2009 Standards and Guidelines requires DEU to identify and explain material deviations between planned versus actual performance results in its required quarterly reports. To the extent the IRP is a collaborative process, we encourage parties to discuss the sufficiency and format of the peak day demand forecast vs. actual data presented in the quarterly reports and modify it if warranted.

Further, Section III.A.1.a of the 2009 Standards and Guidelines requires a discussion of the latest quarterly variance report in an IRP-related meeting and Section III.C. states that ". . . [DEU] will hold a technical conference to present an overview of key IRP results and respond to questions from interested parties." We find and conclude the variance reports and IRP-related meetings, particularly those when DEU presents a review of the heating season, together provide parties with the requested information and venues for asking questions related to the information.

Level of Detail in IRPs

Based on comments and recommendations in this docket, including those on design peak day supply, we find the IRP process may benefit from further discussion among interested stakeholders, aimed at achieving more common consensus on what constitutes the adequacy or sufficiency of information required for IRP filings. The DPU requests the PSC provide further clarification on whether duplicative information should be filed in two or more open dockets

now or in the future. On the other hand, DEU expresses confusion regarding the DPU's desired level of IRP analysis documentation while asserting the belief its current approach is adequate.[8]

In related comments, the OCS states, "The [DPU] discusses past [PSC] guidance on technical and modeling sensitivity analyses and other information that should be included in [DEU]'s IRP for major new resources such as peak hour services and an LNG facility. The [DPU] notes that such information for the proposed LNG facility is lacking in this IRP. The [OCS] agrees with the [DPU]'s assessment and has also noted this deficiency in IRP analyses as discussed in [the OCS's] prior IRP comments and in [the OCS's] testimony in Docket Nos. 18-057-03 and 19-057-13."[9]

Section III of the 2009 Standards and Guidelines reads: "The IRP will be developed in consultation with the [PSC], its Staff, the [DPU], the [OCS], appropriate Utah State agencies, interested members of the general public, and other interested parties. . . ." In addition, Section VIII of the 2009 Standards and Guidelines, "Level of Detail," states: "Each IRP must detail [DEU's] intentions for the planning year(s) and must also provide sufficient information and analyses to show how [DEU] reaches its resource selection conclusions . . . ." To the extent the parties assert DEU is providing insufficient information to satisfy the 2009 Standards and Guidelines, and DEU has committed to work with parties to improve future filings, we direct

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[8] DEU states, "[DEU] believes its current approach to be the correct approach. It included sufficient information in the IRP to meet the 2009 IRP Guideline requirements, while reserving more detailed discussions for other dockets [. . .] Should any party believe that more information is appropriate, it is free to seek such information through data requests, or to request the inclusion of such information in IRP Variance Reports or in future [Integrated] Resource Plans. If a party believes [DEU] has included too much information, it is free to make such observations in comments." *See* DEU Reply Comments at 3-4.

[9] *See* OCS Reply Comments at 2, *and* DPU Comments at 9.

interested stakeholders to convene prior to DEU's filing of the 2020 IRP. We expect the discussion should attempt to identify the additional information parties contend is necessary to satisfy the 2009 Standards and Guidelines (*e.g.*, inclusion of resource material from multiple open dockets, requests for more detailed analyses in support of the DNG Action Plan, etc.) along with the appropriate manner of that information's IRP documentation and presentation. A summary of these discussions should be provided during a 2020 IRP pre-filing technical conference.

Design Peak Day Modeling

The OCS requests that DEU provide a more robust explanation and evaluation of peak day supply and its interaction with other risk mitigation strategies in DEU's next IRP. While we have included this issue in our discussion of the level of detail in IRPs we also find that the 2009 Standards and Guidelines currently provide several opportunities for discussion of this issue.[10] To the extent parties have questions or comments related to this issue, we find and conclude this topic is appropriate for discussion during an IRP-related meeting if requested.

Based on our review of the 2019 IRP, the comments and reply comments submitted by the DPU, the OCS, and DEU, and given there is no opposition, we conclude DEU's 2019 IRP

[10] For example: 1) Section II.A.1 requires DEU to hold a post-IRP filing technical conference to present an overview of key IRP results and respond to questions from parties; 2) Section III specifies that the planning process will incorporate an informal exchange of information in a manner which promotes efficient communication and an atmosphere of cooperation and understanding; 3) Section III.A.1 requires DEU to discuss in an IRP-related meeting, among other things, comments on the adequacy of the usage/customer forecasting and linear programming optimization modeling; and 4) Section III.C. Post-IRP Filing states that ". . . [DEU] will hold a technical conference to present an overview of key IRP results and respond to questions from interested parties."

generally complies with the requirements of the 2009 Standards and Guidelines. We also adopt DEU's commitments set forth in its reply comments.

ORDER

(1) We conclude the 2019 IRP as filed generally complies with the requirements of the 2009 Standards and Guidelines;

(2) We adopt DEU's commitment in its Reply Comments to include an additional subsection labeled "Long-Term Planning" within the "System Capacity and Constraints" section of the IRP, which provides an outline of demand growth trends along with any known future projects beyond the scope of the DNG Action Plan;

(3) We adopt DEU's commitments in its Reply Comments to provide information related to (a) potential projects related to local and corporate sustainability goals; (b) STEP initiatives under Utah Code Ann. § 54-20-105; and (c) distribution expansion in rural areas.

(4) DEU shall convene a stakeholder meeting as early as practicable prior to DEU's filing of the 2020 IRP to discuss concerns regarding the sufficiency of information in the IRP.

DATED at Salt Lake City, Utah, January 16, 2020.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Jordan A. White, Commissioner

Attest:

/s/ Gary L. Widerburg
PSC Secretary
DW#311782

Notice of Opportunity for Agency Review or Rehearing

Pursuant to Utah Code Ann. §§ 63G-4-301 and 54-7-15, a party may seek agency review or rehearing of this order by filing a request for review or rehearing with the PSC within 30 days after the issuance of the order. Responses to a request for agency review or rehearing must be filed within 15 days of the filing of the request for review or rehearing. If the PSC fails to grant a request for review or rehearing within 20 days after the filing of a request for review or rehearing, it is deemed denied. Judicial review of the PSC's final agency action may be obtained by filing a Petition for Review with the Utah Supreme Court within 30 days after final agency action. Any Petition for Review must comply with the requirements of Utah Code Ann. §§ 63G-4-401, 63G-4-403, and the Utah Rules of Appellate Procedure.

CERTIFICATE OF SERVICE

I CERTIFY that on January 16, 2020, a true and correct copy of the foregoing was delivered upon the following as indicated below:

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