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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF DOMINION ENERGY UTAH TO INCREASE DISTRIBUTION RATES AND CHARGES AND MAKE TARIFF MODIFICATIONS	Docket No. 19-057-02 DOMINION ENERGY UTAH' S REPLY COMMENTS REGARDING PRUDENCY REVIEW FOR THE INFRASTRUCTURE TRACKER PROGRAM
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Pursuant to the Request for Comments issued by the Utah Public Service Commission (Commission) in the above-referenced docket, Questar Gas Company dba Dominion Energy Utah (Dominion Energy or Company) respectfully submits its Reply Comments.

On January 13, 2021, the Commission issued its Request for Comments. On March 15, 2021, the Utah Office of Consumer Services (OCS) and the Utah Division of Public Utilities (Division) each submitted comments. Dominion Energy Utah submits these reply comments in response to comments offered by the OCS.

In its comments, the OCS recommended that the Commission require Dominion Energy to update Section 2.07 of its Utah Natural Gas Tariff No. 500 (Tariff) to incorporate a more detailed description and timeline of all Infrastructure-Rate-Adjustment-Tracker-related

filings. OCS Memo at pp. 5, 7. The Company respectfully disagrees with this recommendation because the existing language in the Tariff describes the Infrastructure Rate Adjustment Tracker (ITP) filings and timelines. Section 2.07 of the Tariff states,

The Company will file its next year's annual plan and budget describing the estimated costs and schedule for the Replacement Infrastructure with the Commission no later than November 15 of each year. In April of each year the Company shall provide an updated master list of all HP pipelines and updated HP and IHP project schedules. The Company will file quarterly progress reports describing the Replacement Infrastructure program.

Tariff at p. 2-15. The Tariff further provides, "The Company may file semi-annually, but will file at least annually, an application to adjust the Surcharge." Tariff at p. 2-16. The existing Tariff language includes a description of each of the filings related to the ITP as well as directives as to the timing of each and, therefore, it is unnecessary to update or revise the Tariff.

If the Commission determines that more detail about each filing is warranted the Company suggests that this more detailed timeline be included as an attachment to each annual budget filing. The OCS expressed concern that interested stakeholders need clarity about where to find information related to the ITP. The annual budget filing is the best place for an interested stakeholder to look to review the details about the program and any upcoming filings for any given year.

The OCS also recommends that the Tariff be modified so that Dominion Energy be required to provide an annual update of all master lists of projects and schedules in "June of each year" rather than in "April of each year". OCS Memo at p. 4. Dominion Energy agrees with this recommendation.

Finally, the OCS correctly quotes a prior Division memo that suggests that ITP investment is subject to prudence review in general rate cases. While this can be true, it may

not always be so. For example, if the Division were to complete an audit of the ITP and rates were to become final during a period between general rate cases, then those rates would not be subject to further prudence review in the next general rate case. The Company otherwise defers to its earlier comments as to the proper timing of prudence review.

The Company appreciates the comments of both the OCS and the Division, and the opportunity to comment on these important issues.

RESPECTFULLY SUBMITTED this 12th day of April, 2021.

DOMINION ENERGY UTAH



Jennifer Nelson Clark
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the Dominion Energy Utah's Reply Comments Regarding Prudency Review for the Infrastructure Tracker Program was served upon the following persons by e-mail on April 12, 2021:

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