

Jennifer Nelson Clark (7947)
Dominion Energy Utah
333 South State Street
P.O. Box 45433
Salt Lake City, Utah 84145-0433
(801) 324-5392
(801) 324-5935 (fax)
jennifer.clark@dominionenergy.com

Attorney for Dominion Energy Utah

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF DOMINION ENERGY UTAH FOR APPROVAL OF A SPECIAL CONTRACT WITH FLEET SAVER, LLC FOR RNGT SERVICE	Docket No. 19-057-11 DOMINION ENERGY UTAH'S REPLY COMMENTS
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Pursuant to the Notice of Filing and Comment Period issued on May 28, 2019 in the above-referenced docket, Questar Gas Company dba Dominion Energy Utah (“Dominion Energy Utah” or “Company”) respectfully submits these Reply Comments.

On April 11, 2019, Dominion Energy Utah filed an Application with the Public Service Commission of Utah (“Commission”) seeking approval of the RNGT Service Agreement –RNGT001 between Dominion Energy Utah and Fleet Saver, LLC dated April 2, 2019 (“Fleet Saver Agreement”).

On May 28, 2019, the Utah Division of Public Utilities (Division) filed its Recommendation in this docket recommending that the Commission approve the contract with the following conditions:

1. The Agreement language be modified to make clear that each Approved Receipt Point serves as an Alternate Receipt Point for all the other receipt points;
2. The Agreement incorporate indemnity language from section 5.07 of the tariff as shown in the Division’s comments; and,
3. The Company file a report after the first year of operation that lists (1) the actual maximum one-day Fleet Saver amount at each station, (2) the actual maximum

hourly usage at each station, and (3) any complaints by “normal” CNG customers and neighboring residents/businesses regarding Fleet Saver usage of the stations.

With regard to the first condition concerning Approved Receipt Points and Alternate Receipt Points, Section 5.01 of the Company’s Utah Natural Gas Tariff (“Tariff”) provides the following guidance:

“The service agreement will also identify a primary receipt point where the customer’s gas can enter the Company’s distribution system (Approved Receipt Point). The Company may also, in its sole discretion, accept the customer’s gas at alternate receipt points (Alternate Receipt Points). The Company reserves the right to require each customer to utilize the Approved Receipt Point when, in the Company’s sole discretion, its operational needs support such a change from any Alternate Receipt Point(s).”

Attachment A to the Agreement at issue in this matter includes each designated Approved Receipt Point. Typically, the Company only lists Alternate Receipt Points in transportation contracts when a customer requests an Alternate Receipt Point, and it is operationally and geographically feasible for the Company to permit the customer to use the receipt point. In this case, Fleet Saver, LLC (“Fleet Saver”) has not requested any Alternate Receipt Points and, therefore it is not necessary to include them in the contract.

With regard to the second condition, the Company has included the indemnity language referenced in Tariff Section 5.07 in paragraph number 13 of the Contract under the heading “Liability”.

Finally, regarding the third condition, the Company agrees that it will file a report to the Commission that includes the information identified in the Division’s comments at the conclusion of the first year of operation of the Agreement.

As such, the Company respectfully requests that the Commission approve the Fleet Saver Contract.

RESPECTFULLY SUBMITTED this 11th day of June, 2019.

DOMINION ENERGY UTAH

A handwritten signature in black ink that reads "Jennifer Clark". The signature is written in a cursive style and is positioned above a horizontal line.

Jennifer Clark (7947)

Dominion Energy Utah

333 S. State Street

PO Box 45433

Salt Lake City, Utah 84145-0433

(801) 324-5392

Jennifer.clark@dominionenergy.com

Attorney for Dominion Energy Utah

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 June 11, 2019:

Patricia E. Schmid
Justin C. Jetter
Assistant Attorney Generals
160 East 300 South
P.O. Box 140857
Salt Lake City, UT 84114-0857
pschmid@agutah.gov
jjetter@agutah.gov
Counsel for the Division of Public Utilities

Chris Parker
William Powell
Utah Division of Public Utilities
160 East 300 South
PO Box 146751
Salt Lake City, Utah 84114-6751
chrisparker@utah.gov
wpowell@utah.gov

Robert J. Moore
Steven Snarr
Assistant Attorney General
160 East 300 South
P.O. Box 140857
Salt Lake City, UT 84114-0857
rmoore@agutah.gov
stevensnarr@agutah.gov
Counsel for the Office of Consumer Services

Michele Beck
Director
Office of Consumer Services
160 East 300 South
PO Box 146782
Salt Lake City, UT 84114-6782
mbeck@utah.gov

