

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE REQUEST OF  
DOMINION ENERGY UTAH FOR  
APPROVAL OF A VOLUNTARY  
RESOURCE DECISION TO CONSTRUCT  
AN LNG FACILITY

Docket No. 19-057-13

**SURREBUTTAL TESTIMONY OF MICHAEL L. PLATT  
FOR DOMINION ENERGY UTAH**

September 23, 2019

**DEU Exhibit 4.0SR**

1 **Q. Please state your name and business address.**

2 A. My name is Michael L. Platt. My business address 1140 West 200 South, Salt Lake City,  
3 UT 84104.

4 **Q. Are you the same Michael Platt who filed Direct and Rebuttal Testimony in this**  
5 **proceeding?**

6 A. Yes, I am.

7 **Q. What is the purpose of your surrebuttal testimony?**

8 A. The purpose of my surrebuttal testimony is to respond to an issue raised in the rebuttal  
9 testimony of Mr. Alex Ware.

10 **Q. Mr. Ware states in his rebuttal testimony that “Mr. Neale appears to accept without**  
11 **question or analysis DEU’s RFP bid location requirement.” (Rebuttal Testimony of**  
12 **Alex Ware (Ware Rebuttal), Lines 65-66, 86-90) Do you think this is an accurate**  
13 **representation?**

14 A. No. Mr. Neale conducted a thorough review of Dominion Energy Utah’s (DEU or the  
15 Company) Request for Proposal (RFP), including review of the Optimal Delivery  
16 Location. The Company identified the Optimal Delivery Location during the  
17 development of the RFP. Mr. Ware, Mr. Neale, and other members of the Utah Office of  
18 Consumer Services (Office) and Utah Division of Public Utilities (Division) asked  
19 questions about the justification of that location during the development of the RFP. In  
20 those discussions, I recall that Mr. Neale clarified that the placement of the Optimal  
21 Delivery Location was due to the fact that at that location, the resource could satisfy  
22 pressure and volume requirements should the shortfall affect either north or south from  
23 that location.

24 The Optimal Delivery Location was again discussed at a technical conference held on  
25 June 19, 2019. Mr. Neale attended the technical conference by telephone and viewed  
26 slides. Following the technical conference, Mr. Neale asked additional questions about  
27 the system, its arrangement and operating conditions. These questions were answered and  
28 reviewed in a follow up meeting on July 25, 2019.

29           These meetings are in addition to meetings that the Company had with Mr. Neale in  
30           Docket 18-057-03, where I walked Mr. Neale through the Company's system model and  
31           ran various outage scenarios so he could see the impact that the scenarios would have on  
32           the system and the benefit that adding an LNG facility in the optimal delivery zone would  
33           have to help mitigate these outages. In addition to all of the telephonic meetings held  
34           with Mr. Neale, the DPU asked additional data requests on the subject.

35           Mr. Neale's acceptance of the appropriateness identifying an Optimal Delivery Location  
36           is due to the fact that his questions were satisfactorily answered and consistent with his  
37           experience as an engineer and gas distribution employee.

38   **Q.    Other than Mr. Neale, are there other witnesses in this docket with the experience**  
39   **and education necessary to evaluate your analysis of the Optimal Delivery**  
40   **Location?**

41   A.    Yes. Mr. Schwarzenbach and Mr. Gill both have extensive knowledge of the system and  
42           reviewed my analysis and testimony in this docket and agree with my determination of  
43           the Optimal Delivery Location. Additionally, Mr. Paskett, a third-party consultant, has  
44           extensive industry experience operating LNG facilities and gas distribution systems and  
45           he explains in his direct testimony why an on-system solution is beneficial. The only two  
46           witnesses in this case that remain unconvinced of the need for this facility are Mr. Ware  
47           and Mr. Wheelwright. The Company believes that an objective look at the evidence on  
48           the record supports the Company's proposal to build an LNG Facility at the Optimal  
49           Delivery Location for system reliability.

50   **Q.    Mr. Ware indicates that the process the Company used to develop the assumptions**  
51   **and analyses included in its RFP is flawed (lines 56-57). How do you respond?**

52   A.    The Company sought feedback from the OCS and DPU as it developed its RFP and it  
53           incorporated much of that feedback by making changes to the RFP. The Company is  
54           appreciative of this feedback and believes it helped to improve the RFP that was issued.  
55           It is unfortunate that Mr. Ware feels that he must now criticize the RFP process when the  
56           Company was ready and willing to accept feedback from the OCS.

57 **Q. Is the Optimal Delivery Location an inflexible and mandatory requirement of the**  
58 **RFP, as Mr. Ware suggests on lines 86-92 of his rebuttal testimony?**

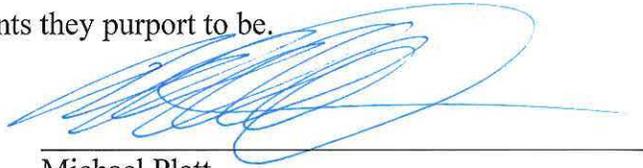
59 A. No. The Company considered and evaluated all proposals, regardless of location. In fact,  
60 two of the proposals identified delivery points outside of the Optimal Delivery Location.  
61 As I stated in my Direct Testimony (lines 268-337), the location does impact the  
62 effectiveness of the resource. For those proposals that had delivery points outside the  
63 Optimal Delivery Location, the Company included cost analysis related to the necessary  
64 reinforcements to allow for an apples-to-apples cost comparison.

65 **Q. Does this conclude your testimony?**

66 A. Yes.

State of Utah            )  
                                  ) ss.  
County of Salt Lake    )

I, Michael Platt, being first duly sworn on oath, state that the answers in the foregoing written testimony are true and correct to the best of my knowledge, information and belief. Except as stated in the testimony, the exhibits attached to the testimony were prepared by me or under my direction and supervision, and they are true and correct to the best of my knowledge, information and belief. Any exhibits not prepared by me or under my direction and supervision are true and correct copies of the documents they purport to be.



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Michael Platt

SUBSCRIBED AND SWORN TO this 23<sup>rd</sup> day of September, 2019.



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Notary Public



**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the Surrebuttal Testimony of Michael L. Platt (Exhibit 4.0SR) was served upon the following persons by e-mail on September 23, 2019:

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