

**In the Matter Of:**

In Re: DEU - Request to Construct LNG Facility

**HEARING (NON CONFIDENTIAL), DOCKET NO. 19-057-13**

*September 26, 2019*

*Job Number: 547818B*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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IN THE MATTER OF: )  
 )Docket No. 19-057-13  
REQUEST OF DEU FOR )  
APPROVAL OF A VOLUNTARY )HEARING  
RESOURCE DECISION TO )WITH CONFIDENTIAL  
CONSTRUCT A LIQUIFIED )TESTIMONY REDACTED  
NATURAL GAS FACILITY )  
 )

September 26, 2019  
9:01 a.m.

LOCATION:  
PUBLIC SERVICE COMMISSION  
160 East 300 South, Room 451  
Salt Lake City, Utah 84111

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Job No. 547818B

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1 September 26, 2019

9:01 a.m.

2 P R O C E E D I N G S

3 COMMISSIONER LEVAR: Okay. Good morning.

4 We're here for a Public Service Commission hearing in  
5 Docket No. 19-57-13, Request of Dominion Energy Utah for  
6 Approval of a Voluntary Resource Decision to Construct a  
7 Liquified Natural Gas Facility.

8 And if anyone forgets that this is a Public  
9 Service Commission, we have a new sign behind our heads.  
10 It's a very subtle sign. But if you're here for the  
11 psychologist licensing board, you're in the wrong room  
12 right now.

13 Why don't we start with appearance for the  
14 utility?

15 MS. NELSON-CLARK: Thank you. My name is  
16 Jenniffer Nelson-Clark, I'm counsel for Dominion Energy  
17 Utah. I have with me Cameron Sabin, who is also counsel  
18 for Dominion Energy.

19 We also have with us Kelly Mendenhall, who  
20 is one of the witnesses who's offered prefiled testimony  
21 and will be available for cross today. And behind me we  
22 have William Schwarzenbach, Tina Faust, Bruce Paskett,  
23 Mike Gill, and Mike Platt. And you'll recognize those  
24 names as witnesses who have also filed prefiled  
25 testimony.

1 COMMISSIONER LEVAR: Thank you.

2 Mr. Jetter?

3 MR. JETTER: Good morning. I'm Justin  
4 Jetter with the Utah Attorney's General Office and next  
5 to me at counsel table is Patricia Schmid, also with the  
6 Utah Attorney General's Office. And we are both here  
7 today representing the Utah Division of Public  
8 Utilities.

9 The division intends to call two witnesses  
10 at this hearing, Allen Neale and Douglas Wheelwright,  
11 and they are both in the hearing room today.

12 COMMISSIONER LEVAR: Thank you.

13 MR. SNARR: Yes. My name is Steven W.  
14 Snarr. I'm an assistant attorney general here  
15 representing the Office of Consumer Services. With me  
16 here at the table is Alex Ware, who will be presenting  
17 testimony today. Thank you.

18 COMMISSIONER LEVAR: Thank you.

19 MR. RUSSELL: Phillip Russell representing  
20 both the Utah Association of Energy Users and Magnum  
21 Energy Midstream Holdings. With me in the courtroom --  
22 in the gallery is Mr. Dave Schultz, a witness on behalf  
23 of Magnum. I believe the witness on behalf of UAE,  
24 Mr. Bieber, is listening in on the live stream, to the  
25 extent that he can today.

1 COMMISSIONER LEVAR: Okay. Thank you. Any  
2 other preliminary matters before we move forward?

3 MS. NELSON-CLARK: There is one. In  
4 preparing our summaries -- our witness summaries, we  
5 discovered that we need to disclose some confidential  
6 information in those conversations, so we will be moving  
7 to close the hearing. We've had conversations with  
8 Mr. Russell, and the solution we think is best is that  
9 any party who is precluded from viewing or hearing the  
10 confidential information will be asked to leave, but we  
11 will agree that Mr. Russell can stay and all of that  
12 information could be provided or heard on an Attorneys'  
13 Eyes Only basis.

14 COMMISSIONER LEVAR: Okay. So the intent  
15 is to deal with that motion as the issues arise?

16 MS. NELSON-CLARK: Yeah.

17 COMMISSIONER LEVAR: So we'll have motions  
18 to close portions of the hearing at some point?

19 MS. NELSON-CLARK: I believe so. I do have  
20 a concern that there will be some cross that will call  
21 for the disclosure of such information, and we'll  
22 interject at that time. I will tell you that our first  
23 witness has a summary that is largely highly  
24 confidential, so...

25 COMMISSIONER LEVAR: Well, we'll deal with



1 those witness as we come to them. As the issue arises  
2 in cross-examination, I think the three of us are going  
3 to have to rely on the attorneys in the room to help us  
4 make sure we don't move forward without taking an  
5 appropriate pause and dealing with the motion --

6 MS. NELSON-CLARK: Thank you.

7 COMMISSIONER LEVAR: -- when it's  
8 appropriate.

9 MS. NELSON-CLARK: Thank you.

10 COMMISSIONER LEVAR: Any other preliminary  
11 matters?

12 (No audible response.)

13 COMMISSIONER LEVAR: Okay. Then, Ms.  
14 Clark?

15 MS. NELSON-CLARK: So the Company would  
16 call Kelly B. Mendenhall as its first witness. And  
17 Mr. Mendenhall's summary is highly confidential, so the  
18 Company would move, under Commission Rule R746-1-703,  
19 for closing -- closing the hearing.

20 And the basis for that is Mr. Mendenhall  
21 would be discussing the particulars of one of the bids  
22 that was received during the course of his summary.

23 COMMISSIONER LEVAR: Okay. Does any party  
24 have any objection to the motion?

25 MR. JETTER: No objection.

1 MS. SCHMID: Just a question, though. And  
2 does this also mean that streaming would be  
3 discontinued?  
4 MS. NELSON-CLARK: Yes.  
5 COMMISSIONER LEVAR: Okay. Mr. Snarr?  
6 MR. SNARR: No objection.  
7 COMMISSIONER LEVAR: Mr. Russell?  
8 (No audible response.)  
9 COMMISSIONER LEVAR: Mr. Clark, any  
10 questions on the motion?  
11 COMMISSIONER CLARK: No, no questions.  
12 COMMISSIONER LEVAR: Or objection to  
13 granting it?  
14 COMMISSIONER CLARK: No questions.  
15 COMMISSIONER WHITE: No questions. Thank  
16 you.  
17 COMMISSIONER LEVAR: Any objection to  
18 granting the motion?  
19 COMMISSIONER CLARK: No.  
20 COMMISSIONER WHITE: No.  
21 COMMISSIONER LEVAR: The motion is granted,  
22 so I think we're going to have to rely on the people in  
23 the room to know who should or shouldn't be in the room.  
24 If there is any disagreement on that, please indicate to  
25 me, and we'll wait until we've resolved that before we

1 stop the streaming, so we'll continue streaming at this  
2 point.

3 MS. NELSON-CLARK: So I see two faces I  
4 don't recognize.

5 (Individuals leave the room.)

6 COMMISSIONER LEVAR: Do we have any  
7 remaining issues with individuals in the room?

8 MS. NELSON-CLARK: No, I think we recognize  
9 everyone else.

10 COMMISSIONER LEVAR: Okay. Then at this  
11 point I'll ask the streaming to discontinue. I am  
12 muting the hearing loop system, because that can  
13 sometimes be picked up in the hallway, and I'm going to  
14 turn the microphone volume down pretty low. If we have  
15 any trouble with you, the court reporter, receiving  
16 everything, we can deal with that but, hopefully, having  
17 the microphones low for this portion of the hearing  
18 won't be too much of a problem.

19 (Confidential testimony begins.)

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COMMISSIONER LEVAR: Okay. We will start the streaming. Do we need to inform participants who have left the room?

The division, if you'd like -- whichever one of you is doing the cross-examination.

CROSS-EXAMINATION

BY MR. JETTER:

**Q. Good morning, Mr. Mendenhall.**

A. Good morning.

**Q. I have just a few brief questions that are probably more directed to questions about which of your witnesses I should be asking these questions to.**

A. Okay. I can answer those.

**Q. So first one. In the event of a supply shortfall where you are going to run short of gas supply, whether a Design Day or otherwise, who would be the best witness to discuss the decision-making process of if and when you would physically disconnect a transportation -- firm transportation customer whose supply was not available?**

1 A. Yeah, that would be Ms. Faust or  
2 Mr. Schwarzenbach.

3 Q. Okay. And who would be the best witness to ask  
4 about decisions to install transportation pipelines to  
5 remote communities of Green River or Kanab and Wendover?

6 A. That would probably be Mr. Platt or Mr. Gill.

7 MR. JETTER: Okay. I don't have any  
8 questions about your testimony, so those are my  
9 questions. Thank you.

10 THE WITNESS: Thank you.

11 COMMISSIONER LEVAR: Thank you. Mr. Snarr?

12 Cross

13 BY MR. SNARR:

14 Q. Yes. Good morning, Mr. Mendenhall. How are  
15 you?

16 A. Good morning.

17 Q. I have just a few questions.

18 You and Mr. Lawton, on behalf of the Office  
19 of Consumer Services, both provided testimony concerning  
20 certain accounting requirements as it relates to lease  
21 payments associated with the use of significant capital  
22 assets and questions about imputed debt; isn't that  
23 correct?

24 A. That's correct.

25 Q. You indicated that the Financial Accounting

1 Standards Board Accounting Requirement ASC 842 requires  
2 the net present value of lease payments to be booked as  
3 a liability, just like certain credit rating agencies  
4 were already treating those lease payments; isn't that  
5 correct?

6 A. That's correct.

7 Q. At lines 14 through 17 of your rebuttal  
8 testimony, you quote Mr. Lawton, indicating -- I'll let  
9 you get to that, if you want.

10 A. Thank you. 14 through 17?

11 Q. Yes.

12 A. Yes.

13 Q. You quote Mr. Lawton, indicating the reason  
14 rating agencies have imputed debt for evaluating  
15 financials and borrowing strength is that leases and  
16 lease-type transactions create fixed-debt-like financial  
17 obligations. These debt-like obligations are  
18 substitutes for capital investments and should be  
19 reflected in the financial metric calculations. Is that  
20 correct?

21 A. Yes.

22 Q. All right. In response to the office's  
23 discovery request No. 214, you've indicated that -- I'm  
24 not sure you need to pull it up. But if you do, we can  
25 certainly take the time.

1                   **You've indicated that if imputed debt were**  
2 **necessary, would -- it would not have an impact on the**  
3 **capital structure calculations for regulatory or GAAP**  
4 **purposes, but it would have an impact on credit metrics;**  
5 **isn't that correct?**

6           A. Yeah. So I believe Mr. Lawton refers to that  
7 in his testimony, doesn't he? So I would like to see  
8 the entire data request response, because I think you  
9 might be --

10           **Q. I think it's your response to No. 214.**

11           A. Yeah, I'm trying to remember where that is. I  
12 think it's in Mr. Lawton's direct testimony. I think he  
13 pulled it in. So let me just find it real quick and  
14 then I'll answer your question.

15           **Q. All right.**

16           A. You said OCS 214; is that right?

17           **Q. That's right.**

18           A. Yes. So I'm there. If we go to Mr. Lawton's  
19 testimony, lines 144 through 150, he has the complete  
20 answer.

21           **Q. Well --**

22           A. So you're correct. I did say it would not have  
23 an impact on capital structure calculations for  
24 regulatory or GAAP purposes, but it would have an impact  
25 on credit metrics.



1                   And then down at the last sentence of the  
2 data request response, I say, "This would have an impact  
3 on cash flows in the form of lower interest costs and  
4 higher revenue requirements due to increased equity  
5 levels."

6           **Q. Now, isn't it true that the credit metrics and**  
7 **the things you just mentioned are used by credit rating**  
8 **agencies but they're reflective of several different**  
9 **considerations that relate to the financial health and**  
10 **well-being of the utility? Isn't that right?**

11           A. The credit metrics, yeah, they're used for  
12 multiple reasons. Is that the question?

13           **Q. They rely on a number of different factors that**  
14 **relate to the financial health and well-being; is that**  
15 **right?**

16           A. Yes, that's correct. In fact, in Mr. Lawton's  
17 testimony -- his surrebuttal testimony, he includes a  
18 table that shows multiple metrics that are used,  
19 although I will point out that he left one very  
20 important metric out of that table. But you're correct,  
21 credit rating agencies look at multiple factors.

22                   MR. SNARR: All right. Thank you. That's  
23 all I have.

24                   THE WITNESS: Yes.

25                   COMMISSIONER LEVAR: Thank you.

1 Mr. Russell, do you want to make a motion  
2 before you start your cross-examination or do you want  
3 to do some and then make the motion?

4 MR. RUSSELL: We'll start, and I'll let you  
5 know when we're going to get into the highly  
6 confidential information.

7 CROSS-EXAMINATION

8 BY MR. RUSSELL:

9 Q. Good morning, Mr. Mendenhall.

10 A. Good morning.

11 Q. I'm going to ask you to start at line 463 of  
12 your direct testimony. It's on page 18, at the bottom.

13 A. Okay. 463, you said?

14 Q. Correct.

15 A. Okay, I'm there.

16 Q. In this line you state, "When considering the  
17 total costs of all the options, the DEU-owned LNG  
18 Facility is the lowest-reasonable-cost option. Based on  
19 my calculations, it is about \$1 million per year less  
20 than the next lowest option."

21 Right?

22 A. Correct.

23 Q. When you say the \$1 million figure, that's an  
24 annual revenue requirement figure, right?

25 A. Right.

1 Q. Okay. So the company's determination that its  
2 proposed LNG facility is the lowest reasonable cost is  
3 based on a comparison of the annual revenue requirement  
4 numbers that you have calculated for each of the  
5 proposals; is that right?

6 A. That's right. The annual impact to customers,  
7 correct.

8 Q. Okay. At the beginning of your -- well, before  
9 I get there, there is a lengthy section of your  
10 testimony which you kind of lay out how you got to those  
11 annual revenue requirements numbers, right?

12 A. Right.

13 Q. And that kind of corresponds with an exhibit in  
14 your testimony. I think it's Exhibit 1.07.

15 A. That's correct.

16 Q. Okay. I'm going to walk through some of that,  
17 and some of that is going to require us to get into the  
18 highly confidential information. But before I get  
19 there, I want to ask you a question about the beginning  
20 of this sentence that we just read, "When considering  
21 the total costs of all of the options."

22 In conducting your revenue requirement  
23 analysis, the company added some costs to some of the  
24 bids, right?

25 A. Right.

1           **Q. And can you tell me why you did that?**

2           A. Well -- so I'd have -- I can walk you through,  
3 maybe, all the costs. Maybe that's the best thing to  
4 do.

5                         So we had the -- we started with the  
6 contract costs. So that was the original bid from the  
7 customer -- or not -- from the bidder, and then we added  
8 to that reinforcement costs. And every project had some  
9 sort of reinforcement costs to get to the optimal  
10 delivery location.

11                        And then we had an imputed-debt cost, and  
12 the reason why in my testimony I -- and that was only on  
13 one of the bidders that I made an imputed-debt cost, but  
14 that was due to the fact that -- from an accounting and  
15 from a credit agency standpoint. As I mentioned in my  
16 summary, if the company builds a facility and has  
17 basically complete control of it but they're paying a  
18 lease payment to somebody else, credit agencies look at  
19 that as basically the same thing as if they owned it.  
20 So we made an adjustment to take that into effect and  
21 the impact on capital structure that that would have.

22                        And then there was a creditworthiness  
23 adjustment that we made based on -- we gave all of the  
24 bids to our internal credit group and they looked at the  
25 numbers and, based on their assessment, determined that

1 none of the bidders could -- and I'm not sure if I can  
2 -- we might be going into confidential stuff now.

3 MS. NELSON-CLARK: If there is a way for  
4 you to answer the question fully without calling on the  
5 confidential --

6 THE WITNESS: I would say based on feedback  
7 from our credit group, we may have made adjustments on  
8 some of the bidders to mitigate those concerns. And I  
9 guess I'll just leave it at that.

10 Q. (BY MR. RUSSELL) Fair enough. Let's go ahead  
11 and have you turn to line 163. It's on page 7 of your  
12 direct testimony. And this is the section in which you  
13 sort of lay out all of that which we were just talking  
14 about, the analysis relating to your annual revenue  
15 requirement calculations associated with each proposal  
16 rate --

17 A. Right.

18 Q. -- including costs of each proposal and then  
19 costs that the company added to each of those proposals,  
20 right?

21 A. Correct.

22 Q. Okay. I want to walk through your analysis.  
23 I'm going to focus on the Magnum options --

24 A. Sure.

25 Q. -- naturally.

1 A. Yeah.

2 Q. But before we get there, I want to identify  
3 what those Magnum options are. I don't think that we  
4 have determined that these are highly confidential. I  
5 think my client is fine doing it this way. The company  
6 has marked them as confidential, but I think that was in  
7 deference to my client. So I think we can identify  
8 these without closing the hearing. And then when we get  
9 into the specifics of your analysis, I think we then  
10 will need to close the hearing.

11 A. Okay. Sure.

12 Q. So let's talk about what the Magnum options  
13 were. There was -- there were -- the response is found  
14 in -- I think it's Exhibit -- their response to the RFP  
15 is your Exhibit 1.04, right? And I don't -- don't  
16 intend to walk through that extensively, I just want to  
17 identify it for the record.

18 A. Yeah. Let me just check that. These are big  
19 exhibits, so...

20 Q. They are.

21 A. I apologize it's taking me a while here. So  
22 I'm almost to 1.04. Yes, 1.04 is Magnum's proposed bid.

23 Q. Okay. And Magnum submitted two bids, but there  
24 were sort of multiple options, the way that the company  
25 sort of analyzed them as three separate bids, right?

1 A. Right.

2 Q. Okay. And so let's talk about what's referred  
3 to in your testimony as Magnum Option 1?

4 A. Okay.

5 Q. And under Magnum Option 1, Magnum would incur  
6 the cost to build -- well, I guess I should say with  
7 each of the Magnum options, Magnum proposed that an  
8 extension would be built linking its hub in Goshen to a  
9 point in Bluffdale, right?

10 A. That's Option 1?

11 Q. Well, I think that's true with each of the  
12 options, right, that there would be this extension that  
13 would be built?

14 A. Yeah, that's kind of the base -- well, for two  
15 of the options, that's kind of the base option, and then  
16 I guess you could say there's maybe some add-ons or  
17 whatever.

18 Q. Sure. And then with Option 1, Magnum would  
19 incur the costs to build that extension from Bluff --  
20 excuse me, from Goshen to Bluffdale, right?

21 A. Let me just verify that.

22 Q. Sure.

23 A. I'm just going to flip to my exhibit real quick  
24 just to make sure. So we're talking about Option 1,  
25 right?

1 Q. Correct.

2 A. So you said -- say that again, I'm sorry.

3 Q. So I think it's the case that with each of the  
4 Magnum options and extension there -- the proposal was  
5 that an extension would be built from the Goshen hub to  
6 a point in Bluffdale, correct?

7 A. Yeah, that's right.

8 Q. And then Magnum Option 1 was that Magnum would  
9 incur the cost to build that extension?

10 A. I think they would -- I think they would  
11 contribute a certain amount to build that extension or  
12 build part of it. I'd have to go back and review it.

13 Q. Okay. And I believe the Magnum Option 2 is  
14 that the company would incur the cost to build that  
15 extension from Goshen to Bluffdale, right?

16 A. I think so. And then I think there may have  
17 also been a sharing of costs of the station -- in our  
18 M&R station.

19 Q. And then do you recall what the distinction  
20 between Option 2 and Option 3 were?

21 A. I thought Option 3 was ownership. The company  
22 would, I guess, own a cavern, if I'm recalling  
23 correctly. And I think -- I think Magnum would still  
24 own and control the line, but the actual ownership of  
25 the storage would go to the company, if I recall



1 correctly.

2 MR. RUSSELL: Sure. Just sort of to  
3 short-circuit some of this for the Commissioners' sakes,  
4 each of these options is described in Mr. Mendenhall's  
5 Exhibit 1.04. It is Magnum's response to the RFP.  
6 They're also laid out in some detail in Mr. Schultz's  
7 direct testimony. I just kind of want to get a  
8 foundation for the discussion here.

9 Q. (BY MR. RUSSELL) With respect to Magnum Option  
10 1, there were actually sort of two kind of iterations of  
11 that option, right? One was delivery to Bluffdale and  
12 then a second iteration of that Magnum Option 1, so kind  
13 of 1A and 1B, would have an extension from Bluffdale to  
14 get the gas that would be delivered to the 471 pressure  
15 zone, correct?

16 A. I believe there were two -- yeah, two options  
17 on Option 1. I believe we took the one that was the  
18 most financially beneficial to Magnum, and that's the  
19 one we included, if my memory recalls.

20 MR. RUSSELL: At this point, I think we're  
21 going to start getting into the numbers in order to  
22 identify these, so I'm going to have to get into some  
23 confidential information. It's -- it is my client's  
24 confidential information, so I'll ask that we close the  
25 hearing.

1 COMMISSIONER LEVAR: Okay. Does any party  
2 object to closing the hearing?

3 MR. JETTER: No objection.

4 MR. SNARR: No objection.

5 COMMISSIONER LEVAR: I'm not seeing any  
6 objection from anyone.

7 Mr. Clark, any questions?

8 COMMISSIONER CLARK: No.

9 COMMISSIONER LEVAR: Mr White?

10 COMMISSIONER WHITE: No questions.

11 COMMISSIONER LEVAR: Okay. Implicit with  
12 this and our previous -- I'll just say for purposes of  
13 the entire hearing, implicit with any action to close  
14 the hearing is a commission finding that it is in the  
15 public interest to do so. And so we're basing that on  
16 the lack of opposition and the reason that was  
17 presented.

18 So at this point we'll close the hearing.  
19 Once again, we'll stop the streaming. We'll take a  
20 moment to make sure that everyone is comfortable with  
21 who is and isn't in the room. And I'll make the same  
22 adjustments to the sound system. If I could just get  
23 some indication when everyone in the room feels like  
24 we're ready to move forward.

25 MR. RUSSELL: I think we're good. I will

1 note that Mr. Schultz has stayed in the room. I think  
2 it's appropriate for him to do so. There will be times  
3 when he has to leave the room when we're talking about  
4 confidential information from entities other than  
5 Magnum, but these are not surprise numbers to him, he's  
6 seen them, so...

7 COMMISSIONER LEVAR: Okay.

8 MR. RUSSELL: I don't think anyone has  
9 objection to Magnum's own folks seeing Magnum's numbers.

10 (Confidential testimony begins.)

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COMMISSIONER LEVAR: Do you want go ahead  
with redirect?

MS. NELSON-CLARK: Thank you.

REDIRECT EXAMINATION

1 BY MS. NELSON-CLARK:

2 Q. Mr. Mendenhall, I want to take us back for a  
3 minute to some of the questions Mr. Snarr asked you. Do  
4 you recall him asking you questions about the credit  
5 agency metrics --

6 A. Yes.

7 Q. -- that were referenced both by you and  
8 Mr. Lawton?

9 A. Yes.

10 MS. NELSON-CLARK: May I approach the  
11 Commission and the witness?

12 COMMISSIONER LEVAR: Yes. I think we give  
13 copies to the court reporter and to the...

14 MS. NELSON-CLARK: Absolutely. Yes, sir.

15 Q. (BY MS. NELSON-CLARK) Mr. Mendenhall, I've put  
16 in front of you a document that has been marked DEU  
17 Hearing Exhibit 1.01H.

18 Could you please identify for me and  
19 explain what that is?

20 A. Sure. This is the Moody's Financial Risk  
21 Indicative ratios. This is found in a -- if you give me  
22 a moment, I can tell you the document it's found in.  
23 It's in Moody's Regulated Electric and Gas Utilities  
24 Rating Methodology issued June 23rd, 2017. It's the  
25 same table that's cited by Mr. Lawton on page -- I don't



1 know what page this is -- on line 48 of his surrebuttal  
2 testimony.

3 **Q. And is it a true and correct copy of the**  
4 **document you've just described?**

5 A. Yes.

6 MS. NELSON-CLARK: The company would move  
7 to admit DEU Hearing Exhibit 1.01H.

8 COMMISSIONER LEVAR: If any party objects  
9 to that, please indicate to me.

10 I'm not seeing any, so the motion is  
11 granted.

12 MS. NELSON-CLARK: Thank you.

13 **Q. (BY MS. NELSON-CLARK) Mr. Mendenhall, can you**  
14 **please describe for the Commission the contents of this**  
15 **document and how it relates to the discussion that you**  
16 **and Mr. Lawton have both had and that you referenced**  
17 **during cross-examination about these risk indicators?**

18 A. Sure. So in my testimony I talk about the cash  
19 flow from operation's preworking capital divided by debt  
20 metric. And if you look on this document, this Moody's  
21 Investors Service document, you can see that that would  
22 be -- that is the second of the four metrics that are  
23 shown here.

24 So you can see it says, CFO pre-WC divided  
25 by debt. And if you go over to the next column, you can

1 see that Moody's weights this factor at 15 percent. So  
2 of these four factors, it weighs them higher than all of  
3 the other factors. And that's basically the factor that  
4 I focused in on my testimony when I talked about the  
5 potential for the company to receive a downgrade.

6 And if you look over -- if you go -- if you  
7 stay on that line, CFO pre-WC debt, and go to the line  
8 that says "Low Business Risk Grid" and you go over to  
9 the A rating, you can see that the A rating metric falls  
10 between 19 to 27 percent. And then when you move to  
11 Baa, that's 11 to 19 percent.

12 So how these are different is you can see  
13 that was the metric that I was using, that's the metric  
14 that's the most highly weighted. And Mr. Lawton has  
15 re-created this table in his testimony, but he's left  
16 that metric out. So if you look on his table, you can  
17 see CFO divided by debt. So I'm looking at his table  
18 now, the second column, that corresponds to the third  
19 row in the hearing document. This is CFO pre-WC less  
20 dividends divided by debt.

21 **Q. Mr. Mendenhall, I apologize for interrupting,**  
22 **but could you identify for the record and the Commission**  
23 **where in Mr. Lawton's testimony you're referencing?**

24 A. Yeah, sorry. I'm on line 48 in -- Table 1,  
25 line 48 in Mr. Lawton's testimony. I apologize.

1 COMMISSIONER LEVAR: Is that surrebuttal?

2 THE WITNESS: Surrebuttal.

3 Q. (BY MS. NELSON-CLARK) Please continue.

4 A. Okay.

5 Q. So you can see the second column it says, CFO  
6 divided by debt. That corresponds to the third line on  
7 the hearing document where Aaa is 34 percent, Aa is 23  
8 to 34, A is 15 to 23.

9 Then you can see the next column over that  
10 says CFO divided by interest. That is -- that  
11 corresponds to the first row in the hearing document,  
12 which is weighted at a 7.5 percent weighting, greater  
13 than 8, 6 to 8, 4.5 to 6, and 3 to 4.5.

14 Then you can see the last column in the  
15 table is debt to capital. That's the fourth row in the  
16 document, which is weighted at seven-and-a-half percent.  
17 If you go down to the Low Business Risk Grid, you see  
18 that corresponds, 29 percent, 29 to 40, 40 to 50.

19 So the only reason I even bring this up is  
20 Mr. Lawton, in his testimony, he focuses on this third  
21 line that is weighted at 10 percent. And if you -- if  
22 you compare the CFO pre-WC divided by debt with the CFO  
23 pre-WC, less dividends divided by debt, the A rating  
24 range is much lower for that than the -- than the CFO  
25 pre-WC to debt, which is the metric I was using.

1                   So I just point that out to make sure that  
2 the Commission has all of the information, has the table  
3 at it was created by Moody's, so that the record is  
4 complete.

5                   MS. NELSON-CLARK: I don't have any  
6 additional cross questions -- or redirect. Excuse me.

7                   COMMISSIONER LEVAR: Mr. Jetter or  
8 Ms. Schmid, do you have any questions about the  
9 redirect?

10                  MR. JETTER: No questions. Thank you.

11                  COMMISSIONER LEVAR: Mr. Snarr?

12                  MR. SNARR: No questions.

13                  COMMISSIONER LEVAR: Mr. Russell?

14                  MR. RUSSELL: No questions. Thank you.

15                  COMMISSIONER LEVAR: Commissioner White, do  
16 you have any questions for Mr. Mendenhall?

17                  MR. WHITE: Yes, one question, and maybe  
18 this is a potential question about direction to another  
19 witness, but just following up on that line of cross  
20 from -- previously on -- I think -- I'm going to be very  
21 careful about indicating it, but this is the option cost  
22 comparison. But there was some discussion around how  
23 the change would have potentially affected revenue  
24 requirements.

25                  THE WITNESS: Right.

1                   COMMISSIONER WHITE: Is that something that  
2 another witness may be able to address at some point or  
3 is that --

4                   THE WITNESS: I can probably address it,  
5 so...

6                   MR. WHITE: And I'll leave it up to the  
7 attorneys to indicate whether this is going to implicate  
8 a confidential...

9                   THE WITNESS: Maybe I can answer it in a  
10 nonconfidential way. So it would -- that particular  
11 option that we were discussing, the total overall  
12 revenue requirement would be reduced. And it would be  
13 reduced to a level where it might be nearer or lower  
14 than the option that is proposed by the company on a  
15 quantitative basis. But I would probably have to look  
16 at it in a little more detail. And I guess I would say  
17 they would be very close still, I think.

18                   MR. WHITE: Let me just ask you this: It's  
19 a little bit hard to read between the lines in the  
20 cross, but what's the best way, I guess -- is this a  
21 communication issue or how would you characterize  
22 this -- I guess, the gap in understanding here? Is  
23 this -- maybe this is a potential question for one of  
24 the other witnesses, but I'm just trying to wrap my head  
25 around what this -- how we got to this point where there

1 is maybe a different number based upon what appears to  
2 be a miscommunication or wasn't, I guess, what's  
3 maybe -- I'm just giving you an opportunity to  
4 characterize that.

5 THE WITNESS: Yeah. Well, I tried to look  
6 at the bid objectively. And I'm a numbers guy, and so  
7 when I look at -- the nice thing about being an  
8 accountant is usually the numbers are what they are.  
9 And so the way I read that contract and I think the way  
10 Mr. Gill read it is reflected in my testimony and my  
11 analysis.

12 And, you know, I submitted this on  
13 April 30th, and today is the first day that, to my  
14 knowledge, anyone has said anything about it or  
15 questioned it. And so I guess we could have talked  
16 about this in other rounds of testimony, if other  
17 parties had felt there was an issue. So maybe there is  
18 communication issues between the parties. I don't know.

19 MR. WHITE: Okay. That's all the questions  
20 I have.

21 COMMISSIONER LEVAR: Commissioner Clark?

22 COMMISSIONER CLARK: Yes, just a couple of  
23 other questions on this same subject, I think.

24 We're talking about a difference of  
25 assumption, or at least a potential difference regarding

1 who bears some element of the reinforcement costs; is  
2 that right.

3 THE WITNESS: Right.

4 COMMISSIONER WHITE: And these are costs  
5 that you didn't see reflected in a particular bid?

6 THE WITNESS: Correct.

7 COMMISSIONER WHITE: And so there -- as I  
8 understood your testimony, there was an assumption --  
9 you or the company made an assumption that costs not  
10 reflected in the bid would be borne by DEU?

11 THE WITNESS: Correct.

12 COMMISSIONER WHITE: And what I -- what I  
13 would also like to understand is: Is there any -- is  
14 there anything you can identify in the -- either the  
15 company's evaluation of the bid or the bid itself that  
16 would support that assumption?

17 THE WITNESS: Yes. So maybe -- it might  
18 take me a moment, so bear with me.

19 COMMISSIONER WHITE: Sure.

20 THE WITNESS: But we reviewed some  
21 information and -- Mr. Russell and I did earlier, and I  
22 didn't base my assumption on that, you know, one  
23 paragraph that he shared with me. So let me -- if you  
24 can give me a moment just to look through Exhibit 1.04,  
25 I'll try and find...

1 COMMISSIONER WHITE: Right. And I recall  
2 your testimony about the paragraph that we looked at  
3 specifically, so I'm really looking --

4 THE WITNESS: Right.

5 COMMISSIONER WHITE: -- for what underlies  
6 that.

7 THE WITNESS: So I'm going to look for it  
8 and if I can't find it, I may rely on another witness to  
9 share that, in the interest of time, because I don't  
10 want to sit up here all day trying to find something.

11 COMMISSIONER WHITE: I'm sure the janitors  
12 are cleaning the restroom right now. It might be a good  
13 time for a break.

14 THE WITNESS: Okay. Actually, I think I  
15 found it, but we may need to go to confidential for me  
16 to --

17 COMMISSIONER WHITE: I'd request --

18 THE WITNESS: -- or we can take a break,  
19 whatever you want to do.

20 COMMISSIONER CLARK: I'd request that we go  
21 into confidential mode, if it's all right with -- if  
22 there isn't an objection.

23 COMMISSIONER LEVAR: Maybe we should at  
24 least identify what page of the exhibit we're talking  
25 about before we address the motion.



1 THE WITNESS: I'm sorry. I'm looking at  
2 page 23.

3 COMMISSIONER LEVAR: Of 1.04?

4 THE WITNESS: Of 1.04.

5 COMMISSIONER LEVAR: So 23 of 286?

6 THE WITNESS: Yes.

7 COMMISSIONER LEVAR: Let me just ask: Does  
8 any party have an objection to closing the hearing while  
9 he answers this question?

10 I'm not seeing any objection.

11 So we will we make a finding that it is in  
12 the interest of the public to close the hearing to the  
13 public while Mr. Mendenhall answers this question. And  
14 we'll ask the streaming to discontinue and I will make  
15 the adjustments to the audio and in terms of personnel  
16 in the room.

17 MS. NELSON-CLARK: I don't see any one here  
18 who shouldn't be.

19 (Confidential testimony begins.)

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1 COMMISSIONER LEVAR: We will restart the  
2 streaming and reopen the hearing to the public. I don't  
3 have any further questions, Mr. Mendenhall. So thank  
4 you for your testimony.

5 MS. NELSON-CLARK: Thank you. And why  
6 don't we go ahead and take a break and reconvene at, by  
7 that clock, 10:35 with the next witness?

8 (A recess was taken.)

9 COMMISSIONER LEVAR: Okay. We'll be back  
10 on the record. Ms. Clark?

11 MS. NELSON-CLARK: Thank you. The company  
12 calls Tina Faust.

13 COMMISSIONER LEVAR: Ms. Faust, do you  
14 swear to tell the truth?

15 MS. FAUST: I do.

16 COMMISSIONER LEVAR: Thank you.

17 TINA FAUST,  
18 called as a witness by and on behalf of Dominion Energy  
19 Utah, having been first duly sworn, was examined and  
20 testified as follows:

21 DIRECT EXAMINATION

22 BY MS. NELSON-CLARK:

23 **Q. Ms. Faust, will you please state your name and**  
24 **business address for the record?**

25 A. Tina Faust, 333 South State, Salt Lake City,

1 Utah.

2 Q. And what position do you hold with the company?

3 A. Director of gas supply and commercial support.

4 Q. Ms. Faust, did you file testimony -- prefile  
5 direct testimony in this docket that was marked DEU  
6 Exhibit 2.0, with accompanying Exhibits DEU 2.1 through  
7 2.15?

8 A. Yes.

9 Q. And were those documents prepared by you under  
10 your direction, or are they copies of the documents they  
11 purport to be?

12 A. Yes.

13 Q. And did you also file prefiled rebuttal  
14 testimony marked as DEU Exhibit 2.0R?

15 A. Yes.

16 Q. And was that prepared by you or under your  
17 direction?

18 A. Yes.

19 Q. And do you adopt the contents of those  
20 documents as your testimony today?

21 A. Yes.

22 MS. NELSON-CLARK: The company would move  
23 to admit DEU Exhibit 2.0, with all of the accompanying  
24 exhibits marked 2.01 through 2.5, and DEU's rebuttal  
25 testimony that is marked as DEU Exhibit 2.0R.

1 COMMISSIONER LEVAR: If anyone objects to  
2 that motion, please indicate to me.

3 And I'm not seeing any objection, so the  
4 motion is granted.

5 MS. NELSON-CLARK: Thank you.

6 **Q. (BY MS. NELSON-CLARK) Ms. Faust, could you**  
7 **please summarize the testimony you've offered in this**  
8 **docket?**

9 A. Yes. Providing safe, reliable service for the  
10 natural gas customers of Dominion Energy in Utah is my  
11 job and a responsibility I take very seriously.

12 The company has experienced supply  
13 shortfalls even on days that were not extremely cold.  
14 In 2011, I witnessed other LDCs in the western United  
15 States lose natural gas service to more than 40,000  
16 customers due to cold weather, coupled with third-party  
17 equipment outages.

18 In the last heating season alone, I  
19 witnessed multiple LDCs experience supply shortfalls.  
20 Fortis BC struggled with supply shortfalls when the  
21 Enbridge pipeline ruptured, and XL and Consumers Energy  
22 experienced customer outages due to the 2019 polar  
23 vortex.

24 DEU currently receives 100 percent of its  
25 gas supply from off-system sources and depends entirely

1 upon third parties along the supply chain to obtain that  
2 gas supply. This includes well production facilities,  
3 many miles of gathering system piping, processing  
4 facilities, storage facilities, compression facilities,  
5 hundreds of miles of cross-country transmission  
6 pipelines and city gate stations.

7           In order to manage this process, DEU must  
8 adhere to a daily nomination cycle schedule. During  
9 periods of high demand, the Company's ability to replace  
10 the supply shortfalls is limited, not only by the  
11 nomination deadlines but also because space is fully  
12 utilized from the storage facilities as well as on the  
13 upstream interstate pipelines.

14           The vast majority of DEU's gas supply is  
15 produced and processed in the remote areas of Wyoming,  
16 where temperatures are much colder than the urban gas  
17 demand centers where our customers reside. When  
18 supplies freeze off or processing facilities are  
19 impacted by cold weather, this gas is not able to reach  
20 our customers as planned.

21           In addition, events like earthquakes,  
22 landslides, fires, equipment failures and other  
23 unpredictable and uncontrollable events can also impact  
24 the company's ability to obtain the gas necessary for  
25 its customers.

1 Force Majeure provisions in the third-party  
2 transportation and storage service contracts place the  
3 risk of these events and the resulting supply shortfalls  
4 onto DEU and its customers. The company conducted a  
5 comprehensive analysis of these risks and the details of  
6 that analysis can be found in Exhibit 2.04 of my  
7 testimony.

8 Loss of service to DEU customers not only  
9 could create a very serious safety issue in our climate  
10 that depends on natural gas for heating homes and  
11 businesses during cold winter days and nights, it also  
12 could result in a very costly inconvenience for  
13 customers and the regional economy. The potential for  
14 these supply shortfalls illustrates the need to find a  
15 long-term supply reliability solution for our customers.

16 Some parties in this proceeding seem to  
17 question whether supply shortfalls will occur that will  
18 threaten the safety of our customers. I would like to  
19 appoint -- I would like to point to a time in  
20 December 1990 through January 1991 when there were  
21 several very serious weather-related shortfalls that  
22 lasted many days. DEU was able to maintain service to  
23 its customers at the time by using several mechanisms  
24 that no longer exist. At the time, the gas supply  
25 purchase functions were performed by the upstream

1 pipeline, Mountain Fuel Resources.

2                   Prior to mandatory, quote, unbundling under  
3 Order 636, the upstream pipeline also had flexibility in  
4 how storage was utilized, how all gas supply was  
5 delivered, including diverting interruptible  
6 transportation customers' gas to DEU.

7                   This is not how gas supply is handled  
8 today. Instead, DEU is responsible, operating under  
9 many more formalized constraints. Simply put, if a  
10 weather event similar to the one in 1990 to '91 were to  
11 occur today, customers would lose -- could lose service,  
12 if additional resources are not brought on line.

13                   In addition, it is very important to note  
14 that DEU's system and its Design Day demand have grown  
15 significantly over the past three decades and is  
16 projected to continue to grow.

17                   Also, DEU cannot depend on interrupting  
18 transportation customers to help replace supply  
19 shortfalls for its firm sales customers, as many of the  
20 same risks that could impact DEU supplies would also  
21 likely impact the supply being delivered for its  
22 transportation customers.

23                   My experience with supply shortfalls, even  
24 during moderately cold temperatures, causes me great  
25 concern. As such, considering the potential for the



1 catastrophic outages that could occur at Design Day  
2 temperatures makes me unwilling to risk not recommending  
3 a long-term supply solution. In Docket 18-057-03 the  
4 Commission stated, "A prudent utility should plan for  
5 such a low-risk but high-consequence event."

6 Many other LDCs use on-system LNG for  
7 supply reliability. In fact, after experiencing a  
8 significant supply shortfall of its own, Southwest Gas  
9 has completed an on-system LNG facility for the  
10 exclusive purpose of maintaining reliability to their  
11 customers.

12 Fortis, BC used existing on-system LNG  
13 facilities in 2018 for the supply shortfalls experienced  
14 during the Enbridge outage I mentioned earlier and they  
15 avoided customer outages. Like Fortis, BC, DEU wants to  
16 be prepared in advance and, therefore, seeks to  
17 proactively have a reliability solution before the  
18 company experiences a potentially catastrophic loss of  
19 service to its customers.

20 Only on-system LNG provides the surety of  
21 supply that is needed. It provides the flexibility,  
22 supply independence, and diversity that customers need  
23 when other resources are unreliable.

24 The company recommends and is seeking  
25 approval from the Utah Commission for an LNG facility to

1 be built in the middle of the DEU demand center for the  
2 purpose of providing the supply reliability needed by  
3 Dominion Energy Utah. That's it.

4 MS. NELSON-CLARK: Ms. Faust is available  
5 for cross-examination and also Commission questions.

6 COMMISSIONER LEVAR: Thank you. Mr. Jetter  
7 or Ms. Schmid?

8 MR. JETTER: I do have a few questions.

9 CROSS-EXAMINATION

10 BY MR. JETTER:

11 Q. Good morning.

12 A. Good morning.

13 Q. In reading your testimony, I'd like to clarify  
14 something, just to start. And this was looking at  
15 Exhibit 2.04, which was the risk analysis that was  
16 attached to your -- I believe your direct testimony.

17 A. 2.04. Yes.

18 Q. And, specifically -- I'm not going to point to,  
19 I guess, the specific sentence, but what I'm looking at  
20 is on page 2. It describes the 3 degrees Fahrenheit  
21 daily mean temperature. And is that accurate, that  
22 that's what you would consider a Design Day temperature?

23 A. So I believe what we consider for Design Day is  
24 a minus 5 at the Salt Lake airport -- minus 5 degrees.

25 Q. That's minus 5 daily mean?

1 A. Yes.

2 Q. Okay. And so maybe describe for me -- the  
3 3-degree Farenheit mean, if that's reached, is that a  
4 situation where every time you would expect to have  
5 customers lose service?

6 A. So Mike Platt might be a better one to  
7 specifically answer it, but I'll try. I think this was  
8 specifically talking about the probability that we were  
9 looking at it happening and the fact that, if it was at  
10 or below a 3-degree Farenheit mean, it would happen once  
11 every 16 years, based on the data from 1980 to 2019. So  
12 it's a little bit of -- not necessarily apples to apples  
13 I think, of what you're asking.

14 Q. Okay. So are you saying that, on the 3-degree  
15 mean day, once every 16 years you would expect to lose  
16 service to some customers? Is that accurate?

17 A. Potentially, yes.

18 Q. Okay. But every time you reach a 3-degree mean  
19 day, you wouldn't expect to lose customers' service?

20 A. I'm just reading this again. Let's see. I  
21 think the point was there are other conditions and other  
22 disruptions that could happen even at a higher  
23 temperature than that. But with the current gas supply  
24 plan, with the way we've got the aquifers held in  
25 reserve, I think that's the point where we could plan to

1 exceed -- it says, "The company modeled the mean  
2 temperature where it could meet demand without using  
3 aquifer capacity, because we're holding that in  
4 reserve." And that mean temperature is 3 degrees  
5 Farenheit.

6 Q. And in previous events where you've had  
7 temperatures in that range or lower, you have relied on  
8 those aquifers, is that right --

9 A. Yes.

10 Q. -- to supply?

11 A. Our total demand was lower in those years, but  
12 yes.

13 Q. Okay. And so those aren't always off line at  
14 that temperature?

15 A. It just depends on the situation and the  
16 problems that we're having.

17 Q. Thank you. That's really the only question I  
18 have regarding that document.

19 And I'd like to ask you a little bit about  
20 treatment of transportation customers. Mr. Mendenhall  
21 said that you might be the correct witness to answer  
22 these.

23 Do you have any process in place where you  
24 would, in fact, go out and turn the valve off to  
25 disconnect a transportation firm service customer whose

**1 supply did not arrive?**

2           A. I think the process would be just exactly what  
3 you said. I think if there was an issue -- and we can  
4 kind of walk through what I would foresee happening.

5                   As you probably know, we have a new tariff  
6 provision to deal with situations where customers --  
7 transportation customers are burning more, potentially,  
8 than they're bringing to the system. And it's called  
9 hold burn, to schedule quantities. It's happened within  
10 the last year. And we're anticipating using that on a  
11 more conservative basis, as opposed to a last-minute  
12 basis, so when we see cold weather coming, we are  
13 anticipating having that on line.

14                   So assuming an event was such that, you  
15 know, weather was expected to be cold, those customers  
16 would be on that kind of restriction, and then we have  
17 the ability to monitor them on a real-time basis. So we  
18 would be able to see if those customers are not holding  
19 burn, and then I think the procedure, as you call it,  
20 would be we would turn those customers off.

21           **Q. Okay. And who would make that decision within**  
22 **your organization to -- let me make a hypothetical.**  
23 **Let's say it's a hospital, and it's, you know, a mean**  
24 **temperature of a zero-degree day. Would you anticipate**  
25 **someone in your organization giving the go-ahead to go**

1 out and shut the hospital off?

2 A. I assume somebody in the organization would  
3 decide whether to do it or not do it. I'm thinking it  
4 would be a decision between operations and gas supply  
5 and potentially upper management.

6 Q. Okay. And, in your experience, do you think  
7 that that's likely to occur, to turn off a  
8 transportation service to a hospital, for example?

9 A. We haven't done it in the past. We haven't had  
10 a situation to date that would, I think, call for that.

11 Q. Okay. And do you think that some of those  
12 transportation service customers are effectively  
13 benefiting from the -- would effectively benefit in the  
14 future from the ability to make up shortfalls by use of  
15 the LNG facility?

16 A. I don't anticipate that that's -- that they  
17 would benefit from it, because I feel like we're going  
18 to be monitoring it very closely and have them on  
19 restrictions. And it would be potentially financially  
20 harmful for them to be using it because they'll achieve  
21 those penalties.

22 If those penalties are not enough, then I  
23 think that's a topic for a different docket. But we  
24 feel like that that would be sufficient currently to  
25 disincentivize them from using it during times when

1 they, you know, don't have gas supply.

2 Q. So let me ask you a little bit about the  
3 penalties and their disincentive value. Would you agree  
4 with me that the probability of a shortfall that occurs  
5 that you would need to rely on the LNG to remain -- to  
6 continue service to customers is a low-probability event  
7 that happens quite infrequently?

8 A. To use the LNG facility? Is that your  
9 question?

10 Q. To use the LNG for system reliability.

11 A. It might be a low probability, but a very high  
12 consequence.

13 Q. And so the suggestion, then, would be that for  
14 -- the sales customers would pay for that risk  
15 mitigation over the life of the facility?

16 A. Meaning they would contribute to paying for it  
17 or that they would pay for penalties?

18 Q. Yes, that they would be paying for it on,  
19 essentially, an overtime basis, rather than on a penalty  
20 basis for sales customers.

21 A. So it wasn't designed nor is it anticipated to  
22 be used by transportation customers.

23 Q. Okay. Has the company covered transportation  
24 customers' gas shortfall in the past?

25 A. It has.

1           **Q. And can you say with any level of certainty**  
2 **that you would, in fact, go disconnect the sensitive**  
3 **transportation customers, universities, schools,**  
4 **hospitals?**

5           A. The intent is that we would take action to  
6 prevent industrial and transportation customers from  
7 using the gas that's, you know, reserved for our sales  
8 customers who paid for it.

9           **Q. So you would, in fact, take those -- even a**  
10 **hospital off line?**

11          A. It hasn't happened, but I think the intent is  
12 that they're not to use -- they're not to use it. We  
13 also have other interruptions for, as you know,  
14 hospitals that are not transportation customers, and  
15 then it's a different level of emergency. But customers  
16 that choose to be transportation customers take on  
17 another level of risk, so...

18          **Q. And so to the extent that the transportation**  
19 **customer does rely on the LNG plant, do you agree that**  
20 **the penalty should be consistent with the similar value**  
21 **per decatherm that sales customers have paid up -- maybe**  
22 **up until that point or something in that relation?**

23          A. I think that would be a topic for another  
24 docket. If, you know, the penalties, for whatever  
25 reason, aren't correct for the transportation customers,



1 it should be addressed in another docket so it is, you  
2 know, decided by the parties what the appropriate  
3 penalty would be.

4 **Q. And do you think the company would support a**  
5 **penalty that might be significantly higher if it reached**  
6 **a point where it was a thousand dollars a decatherm?**

7 A. I can't speak to that specifically right now.  
8 We haven't evaluated it, but I think that they would  
9 support anything the parties agree to be the correct  
10 incentive so the facility is used for the purpose it was  
11 designed.

12 **Q. In your experience, is your gas supply more**  
13 **reliable than most of your transportation customers?**

14 A. It's hard to do an apples-to-apples comparison  
15 of that. I know we have penalties for our gas supply  
16 contracts as well, and we buy a lot of our gas on firm  
17 basis and move it on firm transportation. And my  
18 experience in knowing, basically, having to confirm the  
19 other party's gas supplies, that that isn't the case.

20 But I hate to broad brush. You know, maybe  
21 some of the transportation customers have different  
22 arrangements. I do know -- I've witnessed on these cold  
23 days that a lot -- a portion of their gas supply has not  
24 shown up.

25 **Q. In those instances, did the company provide gas**

1 **to those customers?**

2 A. It totally depended on the situation.

3 So I guess something I should clarify is  
4 that we talk in these -- in this docket about cold  
5 weather a lot, but every day some gas doesn't show up.  
6 And so yesterday or July 4th or whenever, you know,  
7 somebody might have a shortage of their supply to their  
8 transportation customers. And, yes, we provide the gas  
9 and that goes into an imbalance. It happens all the  
10 time.

11 So when we talk about specifics, the very  
12 day that we need the gas, we're not willing or able to  
13 provide the gas for them, it's a different story than  
14 kind of business as usual. But, yes, we have imbalances  
15 every day.

16 **Q. And do you have appropriate staff that would be**  
17 **able to shut off all of the transportation customers if**  
18 **-- or all of those that had a supply shortfall on a**  
19 **Design Day where you had other interruptions?**

20 A. I -- I picture that it wouldn't be gas  
21 supply -- the gas supply department doing it, it would  
22 be the operations department doing it. And we would  
23 have a coordinated effort, because they're in the field,  
24 and whoever could go to -- get there first, they would  
25 be the ones to implement that.

1           **Q. And changing gears just a little bit here. Who**  
2 **would be the person -- would you be involved in making**  
3 **the decision to extend a gas line to places like Green**  
4 **River or Wendover or Kanab?**

5           A. Would I personally be?

6           **Q. Yes. Who would be making those decisions?**

7           A. Well, currently, it's, I think -- the rural  
8 expansion, is that what you're referring to?

9           **Q. Yes.**

10          A. Currently, that falls under the key accounts  
11 group and under the customer group that I oversee. But  
12 it also is in concert with engineering, of course, and  
13 other parties in the company.

14          **Q. Okay. Are you intending to build those lines**  
15 **in the next 20 years?**

16          A. All of them or any one specific?

17          **Q. Any of those three.**

18          A. Which were the three you mentioned again?

19          **Q. Kanab, Green River, or Wendover. And if the**  
20 **answer to that is confidential, we can --**

21                   MS. NELSON-CLARK: Well, I guess I would  
22 object to the degree that I think it may call for  
23 speculation. I'm not sure that the witness, sitting  
24 here today, knows what we're going to do for the next  
25 20 years.

1 Q. (BY MR. JETTER) Maybe I'll rephrase the  
2 question.

3 Is it currently in the plan to do that, to  
4 expand or install those lines?

5 A. There is nothing in the current plan for those  
6 three lines. I think we're evaluating it, because we're  
7 concerned about rural expansion in general. We're  
8 evaluating and seeking interest from parties, if, you  
9 know, they're wanting natural gas into their systems.  
10 But I don't know -- as far as a five-year plan or  
11 something, I don't think it's formally in the plan.  
12 It's being evaluated.

13 MR. JETTER: Okay. Those are all of the  
14 questions I have. Thank you.

15 THE WITNESS: Um-hmm.

16 COMMISSIONER LEVAR: Thank you. Mr. Snarr?

17 MR. SNARR: Yes. Thank you.

18 CROSS-EXAMINATION

19 BY MR. SNARR:

20 Q. Ms. Faust, I have a number of questions  
21 relating to Exhibit 204, if you have that handy.

22 A. I do.

23 Q. And, perhaps, the first thing I'd like to do is  
24 just to look at that page 2 once more to seek just some  
25 clarifications on what you just talked about.

1 A. Okay.

2 COMMISSIONER LEVAR: And I think your  
3 microphone is not picking you up. Sorry.

4 MR. SNARR: Okay. I'll move it right here.  
5 Thank you.

6 Q. (BY MR. SNARR) You indicate there that the  
7 likely temperature of a 3-degree mean or lower would  
8 occur about every 16 years, right? In the middle of the  
9 page there.

10 A. Yes, except -- okay. Yes.

11 Q. And so the 1-in-16 year kind of probability or  
12 discussion here is really talking about how often you're  
13 going to get to that low degree or lower; is that right?

14 A. That's the probability that was performed, yes.

15 Q. And on the top of the page, I think you  
16 indicate that within the gas storage agreements or  
17 available -- the gas that is stored, you access some of  
18 those gas supplies at the peak of providing service but  
19 you hold others off in reserve until it gets real cold,  
20 that same 3-degree or lower kind of marker, and that's  
21 when you bring in those other aquifer storage supplies;  
22 is that right?

23 A. Not always. That's the current gas supply  
24 plan. And that's what was used for the assumptions, I  
25 think, of this probability.

1 Q. Okay. So this is really reflecting a gas  
2 supply plan to appropriately manage the gas supplies  
3 when you have to deal with cold weather situations and  
4 not run out of gas, right?

5 A. Yes.

6 Q. Okay. And that gas supply plan involves  
7 supplies that you have contracted for and you  
8 have -- and it's consistent with your peak day demand  
9 requirements; is that right?

10 A. That's right.

11 Q. And included within that gas supply plan and  
12 the contracts you have is a little extra cushion to  
13 provide some security above and beyond what you are  
14 projecting as a specific peak day need; is that right?

15 A. I believe our current peak day assumes all of  
16 our gas supply shows up, so there would be no cushion.

17 Q. Okay. But the supplies you're talking about  
18 here are all contracted for and under that -- they're  
19 part of your gas supply stack; is that right?

20 A. The aquifers in Clay Basin, yes.

21 Q. Okay. Now I'd like to zero in on some of the  
22 other information that you've provided in that exhibit.  
23 You've identified various different causes of supply  
24 shortfalls. I think it's your Section 3.

25 A. Yes.

1 Q. And I'd like to spend a few minutes on  
2 different portions of that, if we might. First, let's  
3 talk about Cold-Weather Events. You talk about well  
4 freeze-offs there.

5 Using historical data, has the company  
6 identified the probability or possible frequency of a  
7 well freeze-off event occurring?

8 A. I don't know that we've identified the  
9 probability, but we've experienced them when it gets  
10 below a certain degree. Typically, we've noticed, when  
11 it's about a 10-degree mean in Salt Lake City, it's  
12 obviously a lot colder than that where the wells are,  
13 and we start noticing issues with facilities at that  
14 point.

15 Q. But you haven't determined a specific kind of  
16 probability or risk factor assessment on freeze-offs?

17 A. No.

18 Q. Okay. Isn't it true that the company-owned gas  
19 supply production comes from at least 34 different  
20 fields in the Green River and Uinta basins?

21 A. Yes.

22 Q. And isn't it true that gas purchased by the  
23 company comes from many more producing fields and basins  
24 that are connected, either directly or indirectly, with  
25 the DEU gas supplies that are coming into the Wasatch

1 Front?

2 A. Yes.

3 Q. And shifting now -- we've talked about the  
4 probability of a freeze-off. Has the company identified  
5 the magnitude or consequence of a typical gas supply  
6 disruption that might be associated with a well  
7 freeze-off?

8 A. I'm not sure there is a typical situation, but  
9 it has not been identified.

10 Q. Is it true -- or possible that a freeze-off of  
11 a particular well might be totally ameliorated by a  
12 producer or supplier of natural gas finding other gas  
13 supplies upstream of the company's city gates and still  
14 providing gas to meet the company's nomination on a  
15 given day?

16 A. It depends on, I guess, the supplier and also  
17 if the nomination schedule allows it.

18 Q. Okay. To what extent was this possibility?  
19 You know, well freeze-offs might be resolved with other  
20 supplies. To what extent was that included in the risk  
21 analysis and the probabilities and consequences that the  
22 company undertook to analyze as it relates to the gas  
23 supply reliability issues you have identified here?

24 A. I don't believe it's of the type of information  
25 that you could rely on or collect to do a probability



1 analysis. I do know that in the experiences we saw with  
2 other parties that have had issues, specifically  
3 Southwest Gas and others, they were not able to solve  
4 the problem by getting supplies from anywhere else.

5 **Q. Do you have any idea how often in a given year**  
6 **or what your experience has been at DEU, as to how often**  
7 **these freeze-offs occur?**

8 A. It is totally weather dependent. And, again,  
9 it's just my experience that I've noticed when it's  
10 around a 10-degree mean or I'm seeing a forecast of  
11 10-degree mean, I start noticing issues with gas supply  
12 and start expecting issues with gas supply.

13 **Q. Does it occur -- in a typical year, do we get**  
14 **down that low so that we have three or four freeze-offs**  
15 **or 20 or 30?**

16 A. Certain years, when it gets cold, a lot more  
17 than other years. Some years are warm and it doesn't  
18 happen as much.

19 **Q. Okay. You've also discussed instances where**  
20 **processing plants have been shut down, it might be**  
21 **weather related or otherwise; isn't that correct?**

22 A. That's true.

23 **Q. And isn't it true that the company's gas**  
24 **supplies, either company owned or purchased from others,**  
25 **rely on a significant number of different processing**

1 plants?

2 A. A few big processing plants, yes.

3 Q. Okay. And based on historic data, has the  
4 company identified the probability or possible frequency  
5 of possible processing plant shutdowns?

6 A. Have not. But, again, when it's gotten cold,  
7 we've noticed more issues with the processing plants as  
8 well. I think that was also described in the FERC --  
9 the investigation that the FERC did.

10 Q. You also presented data related to this  
11 assessment of supply -- possible supply disruptions that  
12 recount the past -- a period of eight years of recent  
13 occurrences; is that right?

14 A. I believe so. Is that the 2011 to --

15 Q. Yes.

16 A. Um-hmm, yes.

17 Q. I might be bouncing back and forth between that  
18 and this other one.

19 A. Okay. I'm with you.

20 Q. But, in that document, that assessment is  
21 basically what you call disruptions that may have  
22 occurred in the past eight years; is that right?

23 A. Which document again?

24 Q. Let me get the number so we have it clear on  
25 the record here. It's your Exhibit No. 2.05.

1 A. Oh, yes.

2 Q. And I believe that you provided supporting  
3 analysis of these events.

4 Would you accept, subject to check, that in  
5 this document you demonstrated there was approximately  
6 93 different incidents of gas supply disruption over  
7 this eight-year period?

8 A. Yes.

9 Q. And those disruptions came from a number of  
10 different issues or problems; is that right?

11 A. That's correct. And this is probably a subset  
12 of, yeah, information, but yes.

13 Q. All right. And you have some correlations on  
14 this Exhibit 2.05 as it relates to mean temperatures; is  
15 that right?

16 A. Yes.

17 Q. And is it fair to say that the possible gas  
18 supply disruptions happen any time during the year, as  
19 opposed to concentrated in one particular point?

20 A. They happen for different reasons throughout  
21 the year.

22 Q. All right. Now let's go back to some of  
23 those -- let's move back to Exhibit 2.04.

24 When you've had an experience with a plant  
25 shutdown, what's been the magnitude of that disruption?

1           A. I think what we've noticed, at least during  
2 certain times in 2018, the Blacks Fork plant shutdown,  
3 and it was a reduction of 25,000.

4           **Q. Okay. And in response to that shutdown, what**  
5 **happened -- or what did the company do?**

6           A. Let's see. I think we were competing with  
7 other entities to buy supplies in Truday (ph).

8           **Q. And when the day was come and gone, were you**  
9 **able to get supplies to come across the city gates such**  
10 **that no customers on the retail side were ever cut off?**

11          A. We were. We were lucky. We think -- if it had  
12 been colder or if it would have lasted longer, I think  
13 there was concern that it wouldn't have happened that  
14 way.

15          **Q. Now, to what extent has the company included a**  
16 **possibility of a plant shutdown in terms of probability**  
17 **and consequences in the studies and analyses that it has**  
18 **undertaken related to your current gas supply**  
19 **reliability issues?**

20          A. We don't believe it's a controllable enough  
21 event or predictable enough event to do a probability on  
22 that.

23          **Q. All right. You've also discussed landslides**  
24 **and flooding as possible events that could affect gas**  
25 **supply; isn't that correct?**

1 A. That is.

2 Q. You specifically have identified a landslide  
3 area that the DEQ pipeline has been watching. You  
4 indicated that the lines are being monitored by strain  
5 gauges; is that correct?

6 A. Yes.

7 Q. Isn't it true that pipelines regularly inspect  
8 the rights-of-way through which their pipelines pass and  
9 try to become aware of possible threats and do things  
10 like putting strain gauges on areas of land movement or  
11 possible flooding?

12 A. Yes.

13 Q. And with those monitoring procedures in place,  
14 what impact does that have upon an actual disruption  
15 occurring?

16 A. Monitoring, if it's something that happens  
17 slowly, I think would give you some benefit. But I  
18 believe it was in August, there was an unexpected  
19 landslide in Little Cottonwood Canyon that took out our  
20 line. And I don't think things like that -- the whole  
21 point of the risk is that it's unpredictable. Can't  
22 have monitoring on every line that could possibly have  
23 an issue.

24 Q. But where you do have monitoring, you have a  
25 chance to take corrective action to avoid the complete

1 **blowout of that line; isn't that right?**

2 A. If you know in advance. Landslides don't react  
3 in a predictable way, so I think things can still  
4 happen, even with monitoring.

5 **Q. But some pipelines would then remove the**  
6 **threatened -- the earth from the threatened area or**  
7 **otherwise install a line in a different way to avoid**  
8 **that landslide area, if they know that it's going to be**  
9 **a problem; isn't that right?**

10 A. If they have the time to do it and they see  
11 that it's a big enough concern, I assume they do.

12 **Q. Isn't it true that pipelines often run parallel**  
13 **lines within their rights-of-way as another measure to**  
14 **ensure that service will be continued while -- either**  
15 **during maintenance or, perhaps, a disruptive event that**  
16 **would affect one line?**

17 A. They do, but, unfortunately, if you look at the  
18 Kern landslide, they had two lines running through that  
19 and they had to take the pressure down on the one that  
20 wasn't damaged, I believe, to make it safe.

21 And if you look at the Enbridge rupture  
22 that happened last October, they had a parallel line and  
23 they had to take both lines down for safety precautions.  
24 So it doesn't always provide a mitigation of the issue.

25 **Q. In the Kern event, were they able to avoid an**

1 **outright cessation of service?**

2 A. I don't recall exactly. I know Dominion Energy  
3 Questar Pipeline had a line there as well that they took  
4 out of service, and can't speak to the Kern. I know  
5 they had both of them reduce pressure. And it was not  
6 in the wintertime, so...

7 Q. And when you took that line out, the DEQ line,  
8 service continued to the Wasatch Front, didn't it?

9 A. The gas was fed through other city gates.

10 Q. Okay. Right.

11 A. I think there were some customers that -- or I  
12 know there were some customers that were not able to get  
13 gas service during that time period, though.

14 Q. Isn't it true that the company's Wasatch Front  
15 is served by five city gates connected to the DEQP  
16 system and two or soon-to-be three city gates connected  
17 to Kern River?

18 A. Yes.

19 Q. Isn't it also true the company plans to  
20 interconnect its Wasatch Front distribution facilities  
21 with a high-pressure trunk line that would extend from  
22 Hyrum on the north to Payson on the south?

23 A. Eventually, yes.

24 Q. And what is the name of that line, or what is  
25 the plan on that line?

1           A. The plan? I'm probably not the best person to  
2 speak to that, but I think it's quite a while in the  
3 future.

4           Q. All right. Now, the company has done some  
5 studies related to city gate redundancy and supply  
6 diversity and how that can assure a continuation of gas  
7 supply; isn't that right?

8           A. Yes.

9           Q. And has the company run studies that include  
10 the plan for a high-pressure trunk line that we just  
11 talked about?

12          A. I believe that's probably a better question for  
13 Mr. Platt.

14          Q. All right. Now, going to that other exhibit,  
15 No. 2.05. And I just want to touch it in summary and...

16                   Is it true that for the events listed there  
17 that, ultimately, gas supply was maintained and that  
18 there were no cuts to retail customers?

19          A. Yes.

20          Q. Now, I don't believe your initial application  
21 contained similar information related to the Kern River  
22 interconnection, and I believe that's been supplied  
23 later through discovery. Let me ask you just some  
24 summary questions. And if it gets too deep, I can pull  
25 out some exhibits and let you look at it, but I don't



1 think we're going to go that deep.

2 A. Okay.

3 Q. With respect to the Kern River  
4 interconnections, hasn't your experience been similar,  
5 that there have been instances of gas supply maybe not  
6 showing up or needing to be addressed as a problem?

7 A. To date, and I feel fortunate that -- it hasn't  
8 occurred on a Design Day, yes.

9 Q. But in each of those instances related to Kern  
10 River, were those -- I believe those instances -- and  
11 you can check if I'm right or wrong -- there was a  
12 significant number of cuts that were resolved through  
13 contract balancing. Isn't that correct?

14 A. Subject to check, I believe so.

15 Q. And a number of other cuts were resolved by  
16 nominations coming in through later cycles during the  
17 day; is that right?

18 A. Yes. Again, later cycles in the day means the  
19 gas wasn't there necessarily when you needed it, but it  
20 was made up for before the day was over and the load  
21 didn't cause a problem with that.

22 Q. Okay. And so no retail customers lost service  
23 as a result of those issues that occurred on Kern River?

24 A. That's correct.

25 Q. Okay. I'd like to discuss just a few of the

1 other specific risks that you've identified in your  
2 Exhibit 2.04. Let's go to that exhibit for a minute.  
3 We've talked about cold weather, we've talked about  
4 landslides. Let's talk about earthquakes.

5 We never know when they're going to occur,  
6 right?

7 A. No, but we spend a lot of money preparing for  
8 them.

9 Q. We never know if it's going to be the big one,  
10 right?

11 A. We don't.

12 Q. And we never know, even if we had an LNG  
13 facility, whether that would provide an answer to solve  
14 all the problems that the earthquake might cause; is  
15 that correct?

16 A. We don't know that an LNG facility would solve  
17 all the problems that we could look at, that's correct.

18 Q. All right. Let's talk about human error.  
19 You've identified that as a conceivable gas supply risk.  
20 You've provided some information to document that,  
21 instances where human error has been an issue.

22 A. Yes.

23 Q. One of those that you provide there relates to  
24 Northwest Pipeline, or Williams, and a blocked valve  
25 related to the service to Monticello, Utah; is that

1 right?

2 A. Yes.

3 Q. And we never know where human error might creep  
4 in and cause us a problem; is that right?

5 A. That's correct.

6 Q. But in this particular instance, I think the  
7 company has previously indicated the LNG facility that  
8 is contemplated or proposed wouldn't have solved or  
9 resolved those issues at that Monticello location. Is  
10 that right?

11 A. Yes. It can't solve everything that could  
12 happen.

13 Q. Right. And you also identify Upstream Facility  
14 Design Inadequacies and Maintenance. You have a  
15 supporting instance there that relates to the Coalville  
16 event; is that right?

17 A. Right. Both of these instances were provided  
18 as evidence as to how things can occur. And depending  
19 on where they occur, the LNG facility could help.

20 Q. Yeah. In that instance in Coalville, the LNG  
21 wouldn't have helped this situation; is that right?

22 A. No, just a sign of mechanical failure.

23 Q. Cyber-Attacks. As it relates to how cyber  
24 attacks might affect gas supply, would I be correct in  
25 suggesting that the more diversity of gas supplies that

1 we have, we can use that diversity as a hedge against  
2 the possible implications or consequences of a cyber  
3 attack?

4 A. I agree.

5 Q. All right. And Third-Party Damage is another  
6 thing that I know that you have to cope with. When we  
7 have third-party damages, aren't those usually kind of  
8 geographic specific as to a point of interaction between  
9 a third party and your pipeline or something?

10 A. You mean it only happens in certain geographic  
11 areas or...

12 Q. Well, no. I mean, when it happens, you know  
13 where it happened and it's pinpointed and there's one  
14 location where it happened.

15 A. Typically, but we have a lot of them in  
16 different areas, yes.

17 Q. Typically, a bulldozer isn't going to cause two  
18 different ruptures to a pipeline, it only causes one,  
19 and you have to deal with the one it causes?

20 A. Unless there's multiple lines involved, yes.

21 Q. Yeah. And, again, would a diverse set of gas  
22 supplies help hedge against the serious consequences of  
23 that kind of disruption?

24 A. Yes.

25 Q. All right. And I'm not sure we're going to

1 deal with Force Majeure Events, but, again, diversity of  
2 supply can help hedge against those, right?

3 A. Potentially, yes.

4 Q. All right. I'd like to now turn your attention  
5 to the AGA survey. That's your Exhibit No. 2.06.

6 I do understand it's been provided with a  
7 cloak of confidentiality. I'd like to assure you that  
8 I'm not going to ask for company names. I'm going to  
9 try to deal with my questions on a global basis, so I  
10 don't think we have to close the hearing. If I'm wrong  
11 about that, you can signal me?

12 A. Does that mean I can use the redacted copy?  
13 Because, otherwise, I've got one at my seat, if I need  
14 the nonredacted copy.

15 Q. Let's go down the road and let's see whether or  
16 not you need more detail.

17 A. Okay.

18 Q. I'm not sure I can answer that question.

19 MS. NELSON-CLARK: May I approach the  
20 witness? I can direct her to where she can find an  
21 unredacted copy.

22 COMMISSIONER LEVAR: Yes.

23 MS. NELSON-CLARK: Thank you.

24 Q. (BY MR. SNARR) Initially, I'm going to deal  
25 with the -- kind of recap the number recap of the

1 information that you got from other companies. Do you  
2 have that?

3 A. Repeat the question. I have it now.

4 Q. Let me ask the question now. Isn't it true  
5 that in response to that survey, 92 percent, or 46 out  
6 of 50, of the responding LDCs indicated they had not  
7 experienced any supply disruptions in the past ten  
8 years? Isn't that right?

9 A. Yes.

10 Q. Okay. And that really kind of coincides with  
11 the company's experiences as we've previously discussed  
12 in some detail and looked at the Kern River and DEQP  
13 experiences that we just got through talking about;  
14 isn't that right?

15 A. Yes.

16 Q. Okay. Isn't it also true, in the response to  
17 the AGA survey, that 77 percent, or 34 out of 44, of the  
18 responding LDCs indicated that they had secured  
19 alternate upstream transportation contracts, such as  
20 enhanced transportation or no-notice service to respond  
21 to reliability issues? Isn't that correct?

22 A. Yes, but I think "select all that apply" comes  
23 into play, because I think they maybe had more than one.

24 Q. Certainly. Same company may have more than one  
25 of these different resources to respond; is that right?

1 A. Right, including LNG facilities, yeah.

2 Q. Now, the company has an existing contract for  
3 no-notice service with the EQP; isn't that right?

4 A. Correct.

5 Q. The responses to the AGA survey also show that  
6 70 percent, or 31 out of 44, responding LDCs indicated  
7 that they rely upon short-term gas supply or peaking  
8 contracts to provide deliveries to their city gates in  
9 order to respond to reliability issues; isn't that  
10 correct?

11 A. Yes.

12 Q. Now, in a discovery request submitted by the  
13 office, and that's Discovery Request 301, we asked,  
14 "What short-term gas supply contracts has DEU entered  
15 into for the purpose of maintaining gas supply  
16 reliability that could be accessed on a peak Design  
17 Day?"

18 And the company's response was, "DEU has  
19 currently not entered into any gas supply contracts  
20 specifically intended for gas supply." Isn't that  
21 correct?

22 A. For gas supply?

23 Q. Excuse me. Gas reliability -- supply  
24 reliability. I read it wrong.

25 A. So I think the peaking contracts that we have

1 and the short-term contracts that we have are to meet  
2 the peak -- design peak demand. But if any of those  
3 were to fail, it kind of goes back to your earlier  
4 question. We don't have contracts in place for a buffer  
5 or for over a hundred percent.

6 **Q. All right.**

7 A. I'm not sure if that's what the AGA survey  
8 addressed or not.

9 **Q. Could you read the question that was -- that**  
10 **we've just -- could you read the AGA question and maybe**  
11 **we can consider what they were -- what the AGA question**  
12 **was seeking?**

13 A. "If yes," is that where we are? Is that the  
14 question?

15 **Q. Yes. Let me just turn to it.**

16 A. "... identify facilities/third-party services  
17 used to maintain system reliability. Select all that  
18 apply."

19 **Q. Yes.**

20 A. "Short-term Supply Contracts Delivered to  
21 Citygate."

22 So, typically, we don't buy a lot of our  
23 gas at the city gate.

24 **Q. All right.**

25 A. We buy it upstream and transport it.



1 Q. Okay. The AGA survey also shows that a  
2 significant majority of the LDCs who are responding also  
3 rely upon upstream storage facilities to manage their  
4 gas supply disruptions; isn't that correct?

5 A. Yes.

6 Q. And Dominion has six different upstream storage  
7 facilities, I believe that's been identified in your  
8 application; is that right?

9 A. I believe so.

10 Q. Is it fair to say that none of those contracts  
11 have been earmarked to deal specifically with  
12 reliability issues in excess of your peak Design Day?

13 A. That's correct.

14 MR. SNARR: All right. Let me have just a  
15 minute, please.

16 That would conclude my questions.

17 COMMISSIONER LEVAR: Thank you.

18 Mr. Russell?

19 MR. RUSSELL: Thank you, Mr. Chairman.

20 CROSS-EXAMINATION

21 BY MR. RUSSELL:

22 Q. Mr. Faust, I'd like to gain a better  
23 understanding of how an upstream supply disruption would  
24 affect the system itself. The -- you just mentioned  
25 that you buy gas upstream and transport it. Are there

1 particular gate stations that the gas is transported to  
2 when you do it that way?

3 A. It depends on the pipeline, but yes.

4 Q. Okay. Yeah. So there are -- there are --  
5 there's more than one upstream pipeline owned by more  
6 than one company that you get gas from, right?

7 A. Typically, yes.

8 Q. So among those is Dominion Energy Questar  
9 Pipeline and Kern River Gas, correct?

10 A. Yes, and Williams.

11 Q. And Williams. So when you're buying gas  
12 upstream from Dominion Energy Questar Pipeline, where is  
13 that gas delivered to? And I know the question is a lot  
14 easier than the answer, and I'm prepared to have you  
15 give a more complicated answer.

16 A. That's okay. So we have multiple city gates,  
17 because throughout the states of Utah and Wyoming,  
18 there's deliveries that get made to those city gates.

19 Q. Is the focus on any particular city gate, or  
20 when you buy it does it just go to whichever city gate  
21 is attached to the Dominion Energy Questar Pipeline  
22 system?

23 A. It's very specific. Based on FERC regulations,  
24 we have transportation that's not as simple as maybe it  
25 sounds. It needs to be -- we have transportation from

1 point A to B on a firm basis, and we do our best to  
2 nominate on a firm basis for our customers every day.

3           And so there's times when, for example,  
4 Payson has a certain load and we forecast that and  
5 St. George has another load. And usually, St. George is  
6 warmer than Payson, but there's times when it's colder  
7 than normal for St. George and they're using a lot more  
8 gas. Then we have to route gas from a point -- a  
9 receipt point that we have to that delivery point to  
10 make sure the gas actually flows there, because the  
11 pipeline can't just do it like in the old days and let  
12 it flow where it needs to go.

13           **Q. Okay. I think -- I have a couple of**  
14 **cross-examination exhibits that might help us with this**  
15 **discussion. At least I hope so.**

16           A. Okay.

17           **Q. I'm going to pass those out. And I'll**  
18 **apologize in advance. I didn't premark these. I wasn't**  
19 **sure if I was going to need them.**

20           A. Thank you.

21                       MR. RUSSELL: May I approach?

22                       COMMISSIONER LEVAR: Thanks.

23           **Q. (BY MR. RUSSELL) Okay. Let's quickly talk**  
24 **about what these are, and then we'll -- I think these**  
25 **will allow us to speak in maybe a little bit more detail**

1 than we've been able to thus far.

2 Let's focus first on the one that says on  
3 the front Dominion Energy Questar Pipeline 2019 Customer  
4 Meeting.

5 Do you have that one?

6 A. I do.

7 Q. And I'll just -- here is what this is. I found  
8 this on the Dominion Energy website. It's a longer  
9 presentation than what is included here. I only wanted  
10 to talk about the map that is on the back of this page  
11 -- or the second page. And for our purposes, I'll mark  
12 this as Magnum Cross Exhibit 1.

13 And do you recognize this map on the second  
14 page?

15 A. Yes.

16 Q. Can you tell me what it is?

17 A. A system map for Dominion Energy Questar  
18 Pipeline.

19 Q. Does that show points along the Dominion Energy  
20 system used to serve customers along the Wasatch Front  
21 and elsewhere?

22 A. Some of them.

23 Q. Sure. The ones that interconnect with the  
24 Dominion Energy Questar Pipeline system?

25 A. Right, but there's many more points along the

1 way.

2 Q. So what does this not show us?

3 A. All the other map points. These are the  
4 interconnects, as you stated. So there's hundreds of --  
5 they call them map points, meter allocation points where  
6 gas flows from other gathering lines or from wells that  
7 are near into the system.

8 Q. Okay. So it's not a comprehensive list, but it  
9 does provide us some detail on where the gas comes from,  
10 if the gas is coming upstream from Dominion Energy  
11 Questar Pipeline, right?

12 A. Right.

13 Q. Fair enough. And then let's turn to the other  
14 map. And this is a map that I pulled off the Kern River  
15 Gas transmission website.

16 Do you recognize it?

17 A. I do.

18 Q. And can you describe what it is?

19 A. Various insets and also the main point-to-point  
20 pipeline of Kern River.

21 Q. Okay. I'm looking at the section along the  
22 Wasatch Front that identifies a number of -- I'm going  
23 to use the term receipt points, but I don't know if  
24 that's an accurate term.

25 A. That's correct, a receipt point into our

1 system.

2 Q. Okay. And does that identify receipt points  
3 that -- from which Dominion Energy could receive gas  
4 from Kern River?

5 A. Yes. It's a little deceiving, because some are  
6 very small, but yes.

7 Q. And then I'm going to label this as Magnum  
8 Cross Exhibit 2. Then I'll turn to the other one that I  
9 handed you, which is a -- it's a technical conference  
10 presentation from June 19th of 2018.

11 Do you recognize that?

12 A. I do.

13 Q. Did you have any input in creating this  
14 document?

15 A. Part of it, I think.

16 Q. And remind me, did you attend that technical  
17 conference?

18 A. I believe I did.

19 Q. I believe I did, too. Let's identify this as  
20 Cross Exhibit 3. And I'm only going to ask you about  
21 one page of the technical conference presentation and it  
22 is the page labeled 9. If you could turn to that now.

23 Do you have that?

24 A. I do.

25 Q. Okay. I want to look first at the third bullet

1 here, which says that "DEU has historically purchased  
2 gas supply delivered to the following stations," and  
3 then it identifies some stations.

4 Can you identify for me, like, where these  
5 stations are?

6 A. On the map?

7 Q. Sure.

8 A. Sure. Hunter Park, if you start on the right  
9 side of the Kern River Map, it's three down.

10 Q. Three down from the text that kind of starts at  
11 the top of --

12 A. It starts "Redwood" on the map.

13 Q. Yeah.

14 A. Do you see that there?

15 Q. Yeah. Thank you.

16 A. And then Riverton is six down. Then Wecco  
17 central -- sorry, I'm skipping around to stay on the  
18 same map. But Wecco is third up from the bottom, if  
19 you're still in Utah, 2.4010. Central is 2.4009, but  
20 Kern combines them for nomination purposes. They're  
21 both very small.

22 Q. Okay. So Hunter Park, Riverton, and then Wecco  
23 and Central are receipt points for gas obtained from  
24 Kern River Gas, correct?

25 A. Right. There's more than that as well. I

1 think -- go ahead.

2 Q. Okay. Well, I guess I'm trying to understand  
3 what -- the significance of this statement that this is  
4 historically purchased gas supply delivered to the  
5 following stations.

6 What does that mean?

7 A. It goes back a little bit to a conversation I  
8 was having with Mr. Snarr. If you focus on gate station  
9 purchases, it's something that doesn't happen, that we  
10 don't do that much because we have our own  
11 transportation. So we nominate, typically, with Wexpro  
12 from the well, gather it through the transportation  
13 lines or we buy it on transportation lines and transport  
14 it to the gate station on our own behalf.

15 This is a discussion of when we're buying  
16 gas delivered. So someone else would deliver the gas to  
17 us, and we would -- it would be an all-in bundled price.  
18 How much they charge us for the transportation, that's  
19 unknown, it's a combined price. But other LDCs  
20 potentially buy more supplies -- more of their portfolio  
21 already delivered and don't hold the transportation.

22 In our case, these are the few that were  
23 listed of where we've purchased gas supplies in the  
24 past, but it is not where we get most of our gas supply.

25 Q. Okay. I think I understand that. So this list



1 of gate stations is where you have purchased gas  
2 historically. When you purchase gas at a gate station,  
3 this is where you do it?

4 A. Yeah, the operative word is "delivered."

5 Q. Okay.

6 A. Purchased, delivered. So instead of going to  
7 the grocery store and bringing it home yourself, you're  
8 paying the grocery store to deliver it to you, and you  
9 buy it at your house versus at the grocery store. Does  
10 that make sense?

11 Q. Yeah. Okay. I think I understand now.

12 But, typically -- as I understand it, what  
13 you're saying is that you typically acquire the gas --  
14 or purchase the gas upstream and then deliver it through  
15 the various systems to your system. And I guess what  
16 I'm trying to understand is how a disruption in upstream  
17 supply affects deliveries to the system and whether  
18 those are -- so if there is a -- well, before we move  
19 off that, just for the sake of completeness, we  
20 identified Hunter Park, Riverton and Wecco Central.  
21 Payson, I think you said earlier, is a gate station on  
22 the DEQP system, right?

23 A. Right.

24 Q. And where is Foothill?

25 A. Rock Springs, Wyoming.

1 Q. And what upstream system is that one on?

2 A. I believe Dominion Energy Questar Pipeline.

3 Q. Okay. All right. So let's maybe set these  
4 aside. That helps me a little bit. I don't know if it  
5 helps anybody else, but it helped me, so thank you.

6 So let's talk a little bit about, you know,  
7 in the instance of a supply disruption on the Kern River  
8 side of things.

9 A. Okay.

10 Q. How does that affect the receipt points or the  
11 pressures at the receipt points through which Dominion  
12 takes gas from Kern River?

13 A. So if you look at, for example, Southern Utah,  
14 Wecco Central, if there was a disruption upstream, then  
15 our Southern Utah deliveries would struggle. And  
16 transportation customers off of that point, if there  
17 wasn't pressure there, they would not get the gas that  
18 they need.

19 Q. So why would it just be the Southern Utah ones?  
20 If there is a disruption upstream, would it affect all  
21 of the receipt points or only certain ones?

22 A. So maybe a better example would be just --  
23 maybe I should start with describing Kern River.

24 Upstream of Wecco can be fed by Goshen or  
25 by Opal or by Muddy Creek. So if you look at the points

1 upstream, there's a lot of gas that comes into Kern  
2 River on the north end. And the advantage we have in  
3 Salt Lake is that if there's a disruption, we can get  
4 gas off of Goshen, going north. We can feed it in  
5 different directions. That's different than Dominion  
6 Energy Questar Pipeline.

7 But if there's a disruption upstream, it's  
8 hard to get more gas to that point unless it's going  
9 by -- or there's still gas going that direction.  
10 Typically, it's going to California, but there are ways  
11 through displacement that the gas can be potentially  
12 rerouted.

13 **Q. Sure. The question I'm trying to get to is:**  
14 **When there is an upstream disruption, does it affect**  
15 **each of the receipt points equally, or does it burden**  
16 **certain receipt points more than others?**

17 A. It depends how big the outage is. When Opal  
18 goes out, there's Opal gas molecules that technically  
19 make it all the way to California, depending on the day.  
20 So it could affect all of them or, on different days,  
21 different places upstream could affect different receipt  
22 points differently.

23 **Q. And why would it affect different receipt**  
24 **points differently?**

25 A. Because of the proximity of where the gas is

1 located.

2 Q. So it might affect some of the farther-away  
3 receipt points? Depending on where the disruption is,  
4 it might affect some of the more distant receipt points  
5 more than some of the ones that are closer?

6 A. Depending on the situation.

7 Q. Okay. Is it possible to affect only a single  
8 receipt point if you've experienced a supply disruption?

9 A. I'm a little confused about the question,  
10 because it might only be one receipt point that matters  
11 to a certain supplier. We have multiple, but other  
12 suppliers might only have one receipt point so,  
13 obviously, a disruption to that receipt point would be  
14 catastrophic for them.

15 In California -- I guess I can't speak to  
16 that, but if the gas doesn't make it, obviously there's  
17 going to be problems for the parties who don't get the  
18 gas they're expecting.

19 Am I missing your question?

20 Q. Well, no, I'm sure you're answering the  
21 question correctly. I don't know that I'm asking it the  
22 right way.

23 There has been some analysis about the  
24 volume necessary to respond to particular supply  
25 disruptions, and I'm trying to understand how a supply

1 disruption would affect the system if there is some sort  
2 of upstream supply disruption.

3                   And I gather that the company has  
4 determined that there is a requirement to provide supply  
5 reliability of 150 decatherms. And what I'm trying to  
6 understand is if, in the event of a supply disruption  
7 upstream on, you know, the Dominion Energy Questar  
8 Pipeline or the Kern River gas transmission pipeline,  
9 how that supply disruption will affect the system and  
10 how the proposed supply reliability solution will  
11 respond to those -- to those impacts on the Dominion  
12 Energy system.

13                   Does that make sense?

14           A. I think so.

15           Q. So with that in mind, if there is a -- I mean,  
16 we spoke earlier -- or you spoke earlier about the -- I  
17 think it was Blacks Fork processing plant that went  
18 down.

19                   Do you have an understanding of how that  
20 affected supplies to the Dominion Energy distribution  
21 system?

22           A. Yes. I believe they were reduced by the amount  
23 that the plant couldn't produce.

24           Q. And where did that reduction occur?

25           A. On the Dominion Energy Questar Pipeline.

1 Q. Was it distributed throughout the -- oh, on the  
2 Dominion Energy Questar Pipeline. Okay. Go ahead.

3 A. Right.

4 Q. And was that shortfall distributed evenly among  
5 the places where Dominion Energy Questar Pipeline  
6 intersects with the Dominion Energy distribution system  
7 or was it targeted at a particular point; do you know?

8 A. Well, I think actually the plant went down a  
9 lot more than that. That was our share of it. And so,  
10 like I tried to describe earlier, we had a nomination  
11 from point A to point A. Point A was Blacks Fork, point  
12 B was a city gate -- or multiple city gates based on  
13 what our transportation contract allows.

14 And so those nominations were cut to zero,  
15 and we had to change, potentially, you know, a storage  
16 facility or make another nomination to make up for that  
17 at that delivery point.

18 Q. And do you know, just off the top of your head,  
19 your sort of normal operating transportation agreements  
20 with Dominion Energy Questar Pipeline and Kern River  
21 where your contract allows -- where the point B is on --  
22 point A to point B, do you know where those point Bs  
23 are?

24 A. It's a complicated scenario, because there's so  
25 many of them, and so it's handled almost, like, through

1 computer optimization.

2 Q. Okay. But the contracts, I gather, allow you  
3 to identify the amounts that would go to each of those  
4 point Bs, right?

5 A. It will only allow you to nominate up to the  
6 contract quantity, yes.

7 Q. And even in the event of a shortfall, you're  
8 getting -- well, what happens in the event of a  
9 shortfall if you're not getting all of what you asked  
10 for? How does it -- how do you distribute among those  
11 point Bs on the distribution system?

12 A. That point B would be cut by the amount that  
13 point A was cut. So there's a bunch of point As going  
14 to every point B on this particular situation.

15 The particular point B it was nominated to  
16 would be cut by 25,000 in this example. And what I'm  
17 recalling happened, because it wasn't a peak day, there  
18 was room in Clay Basin, or the aquifer, and a no-notice  
19 situation made up for that difference. No-notice is  
20 like a cycle-five correction for things that don't show  
21 up.

22 Q. Sure. And so is it -- are each of the points  
23 at which the company receives gas on the distribution  
24 system from wherever that supply disruption is, are they  
25 reduced proportionately or equally? How does the

1 company -- I mean, I get that you've got other ways you  
2 can get the gas there, but...

3 A. The upstream pipeline cuts the delivery to  
4 where it was nominated.

5 Q. But if there's more than one place where it  
6 might go -- is there ever a situation where there's more  
7 than one place it might go on the Dominion system?

8 A. Yes, but that would be two nominations.

9 Q. Okay. So if there are -- if there is a  
10 situation when there's two -- or more than one  
11 nomination, how is the gas shortfall distributed amongst  
12 the places on the distribution system?

13 A. If it's not cut all the way, then it would be  
14 prorated.

15 Q. All right. Understood.

16 Let's shift gears a little bit and help me  
17 understand exactly what the company means when it talks  
18 about a shortfall.

19 A. Gas supply that is purchased or nominated to  
20 the system is expected at a certain amount and a lesser  
21 amount shows up, either through a nomination cut or some  
22 sort of mechanical failure or -- you know, which usually  
23 results in a nomination reduction.

24 Q. And what we're talking about when we talk about  
25 shortfall is the delta between what you nominated and



1 what you received?

2 A. Um-hmm.

3 Q. And given the discussion that we've just had,  
4 help me understand what the company -- this 150,000  
5 decatherm-per-day number is kind of thrown around. Help  
6 me understand what the company is trying to respond to.

7 What is the -- when the company has  
8 determined that there is a likelihood or, you know, some  
9 risk of a shortfall of 150,000 decatherms, tell me where  
10 that -- how that 150,000 decatherms would affect the  
11 system, if there were such a shortfall.

12 A. Depending on the day, 150,000 is a little bit  
13 more than we've seen historically and, with expected  
14 growth, we thought that that was a good volume. I don't  
15 think it's anticipated that it would be taken equally  
16 all day in a situation like this. And it's hard to  
17 predict. I guess that's what we would like to have, is  
18 something that's flexible and could come on for an hour,  
19 if there was a problem.

20 But 150,000, I think, has been discussed by  
21 multiple witnesses, as far as it met our anticipated  
22 needs and it was a common tank size that would hold the  
23 amount -- the 1.2 BCF that would be able to be vaporized  
24 with the common facilities -- or "common" is the wrong  
25 word, but typical facilities that wouldn't be a special

1 order and it would fulfill our anticipated needs.

2 It would not be anticipated to be able to  
3 solve every problem under every circumstance, but if  
4 there was a shortfall at a gate station, typically that  
5 would fall within that volume, 150,000. And the  
6 duration of what we've seen in the past typically we  
7 thought would be the right volume and duration.

8 Q. Okay. I'm going to go back to the Blacks Fork  
9 processing plant shutdown. I think the number you gave  
10 was a shortfall of 25,000 decatherms.

11 Do you know where on the company's  
12 distribution system that was experienced?

13 A. Where the shortfall -- where it was supposed to  
14 be delivered?

15 Q. Yeah.

16 A. I do not.

17 Q. In your testimony, do -- I'm sorry, I'll go  
18 back.

19 Do you know whether it was a single point  
20 on the distribution system or multiple points on the  
21 distribution system?

22 A. I don't recall.

23 Q. Okay. In your testimony you also talk about  
24 some other times in recent history when the company has  
25 experienced supply shortfalls. I think January of 2017

1 was one of them.

2 A. Um-hmm.

3 Q. Can you remind me what the cause of that  
4 shortfall was?

5 A. I'm trying to recall. I think it was multiple  
6 well issues, upstream processing plant issues for --  
7 that we were having sources come from a lot of different  
8 areas. And, also, the load was relatively -- I mean, it  
9 wasn't a peak Demand Day, but it caused more issues just  
10 because of cold weather and we saw additional gas  
11 supplies freezing off as the day went on.

12 And, again, as I recall, the issue from the  
13 morning got worse. And as the situation is getting  
14 worse and we're losing pressure, people are telling us,  
15 It's in the next cycle, we've got the gas supply for  
16 you. And each supply cycle, it ended up the gas not  
17 showing up and the weather getting colder with the  
18 forecast.

19 Q. Okay. Do you know where on the company's  
20 distribution system the shortfall was experienced?

21 A. I did at the time, but I don't recall at this  
22 moment.

23 Q. Yeah, that's fine. Do you know what the  
24 magnitude of that shortfall was?

25 A. I don't recall exactly.

1 Q. Okay.

2 A. I do recall it was a wake-up call, though.

3 Q. Either in your testimony or one of your  
4 exhibits, I can't recall which, you also reference a  
5 December 5, 2013, shortfall.

6 Do you know what caused that one?

7 A. I'm trying to remember. As I recall, it was  
8 similar, cold weather, processing plants having issues.

9 Q. Do you know what the volume of that shortfall  
10 was?

11 A. I don't recall.

12 Q. Do you know where that shortfall was  
13 experienced on the distribution system?

14 A. Where it was nominated to?

15 Q. Yeah.

16 A. No.

17 Q. Okay.

18 A. I assume the city gates in the Wasatch Front,  
19 but...

20 Q. And why do you say that?

21 A. Because that's where the majority of our gas is  
22 nominated.

23 Q. Okay. And when the company experiences these  
24 shortfalls -- and if it's different for each one, you  
25 can kind of separate them out -- how does the company

1 respond when there's wellhead freeze-offs in the  
2 processing areas in Wyoming, for instance, and you've  
3 been informed that you're going to receive a shortfall?  
4 How does the company respond to maintain system  
5 pressures?

6 A. Typically, the first response, if it's a  
7 business day, is to try to go out and buy short-term  
8 supplies on the spot market.

9 Q. Okay. That's one of the tools that's available  
10 to you?

11 A. If people are in the office and available and  
12 there's gas available, that's usually where we start,  
13 early in the morning when we realize there's an issue.  
14 Obviously, if it happens in the middle of the day or on  
15 a holiday or a weekend, those options aren't as  
16 available.

17 Q. Okay. And if you're not able to do that,  
18 you're not able to do enough of that to address the  
19 problem, what is the next solution?

20 A. I think you check to see if storage is fully  
21 utilized. It just depends on how serious it is and how  
22 cold it really is at the time.

23 If it becomes an issue where customers are  
24 not going to get their gas, then we look at interrupting  
25 transportation customers. And we've done that. Back

1 then, we didn't have all the tools, we didn't have the  
2 hold burn. So going forward, it would probably be a  
3 little bit different, I would anticipate, just as far as  
4 imbalance restrictions, but...

5 **Q. Sure. And then I noticed in your testimony**  
6 **you've referenced the aquifers a couple of times, and it**  
7 **seems as though those are the solution of last resort.**  
8 **Is that accurate?**

9 A. Currently.

10 **Q. And why is that?**

11 A. Because it's something that can be relied upon  
12 on basically a no-notice basis. And we're the only  
13 parties in that facility, so we don't have to worry  
14 about the allocation issues, it's already been  
15 allocated. And also, currently, it's -- at least part  
16 of it is combined -- it's part of the peak-hour service  
17 that we have.

18 Again, that's not necessarily going to be  
19 the case long-term, but that's currently how we're  
20 operating it.

21 **Q. Okay. And when there is some sort of upstream**  
22 **supply disruption, how quickly does the company get**  
23 **notice that there might be some shortfalls?**

24 A. We typically watch the system. If we rely on  
25 the notice, it's way too late, because pipelines have to

1 notify all the shippers at the same time. So we're  
2 looking at the places where we have gas coming in in the  
3 processing plants and we notice if they're not producing  
4 like they should be. And so we're kind of on watch  
5 ahead of time for those kinds of things, as you would  
6 hope most shippers would be.

7 Q. Okay. And then if you, in your monitoring of  
8 the system, notice that you're not getting the supplies  
9 that you -- that you've nominated, what's the next step?  
10 Do you call up and say, What's going on, or do you start  
11 going out in the market and getting purchases or what is  
12 the next step?

13 A. Both. All of the above.

14 Q. Okay. And how quickly do you do that?

15 A. As soon as we're aware of an issue. We're  
16 pretty proactive to those kinds of things. We -- our  
17 priority is not to have any customers lose service.

18 Q. Sure. And when you -- by being proactive, how  
19 quickly can you address a supply shortfall of -- I know  
20 we know that the Blacks Fork one was 25,000. How  
21 quickly were you able to act to address that shortfall?

22 A. I don't recall the timing of that exactly, but  
23 just hypothetically, it depends on when you find out  
24 about it. And if the nomination deadline has just  
25 passed, then you can't do anything about it until the

1 next deadline, and then you have to wait to see if that  
2 gas is actually confirmed. And sometimes it's eight or  
3 12 hours before the gas supply actually gets to you. It  
4 all is dependent on when you -- what time of day it is  
5 when you realize an issue.

6 Q. Yeah. And I think there's been some testimony,  
7 I don't know who -- sorry -- about the benefits of  
8 having a supply reliability solution that is not subject  
9 to those scheduling requirements, right?

10 A. That's correct.

11 Q. Is that the reason that you don't want to have  
12 to wait?

13 A. Yes. It's instantaneous, basically.

14 Q. Just a couple more questions. We talked about  
15 sort of where along the distribution system there  
16 might -- you know, if there's an upstream supply  
17 disruption, we might experience shortfalls along the  
18 distribution system.

19 What is -- to your knowledge, what is the  
20 largest supply shortfall in a single gate station that  
21 the company has experienced?

22 A. I don't recall.

23 Q. Okay. As we've talked about this 150,000  
24 decatherm shortfall, is it possible to experience a  
25 150,000 decatherm shortfall at a single gate station?



1           A. Yes. I believe we have city gate stations that  
2 are larger than that, flow more gas than that.

3           **Q. That might be the case, but given where the gas**  
4 **comes from upstream and then it goes to more than one**  
5 **gate station, I guess I'm struggling to understand how a**  
6 **single gate station would experience the 150,000**  
7 **decatherm shortfall.**

8           A. Because we have a BCF along the Wasatch Front,  
9 and so some of those gate stations are large and some of  
10 the gas supplies can go to more than one. A lot of them  
11 follow the same trunk line -- or main line from the  
12 Questar pipeline until you get closer to the city and  
13 then they split to serve different city gates. So it's  
14 just not all one coming through one city gate station to  
15 Salt Lake.

16           **Q. And if one gate station is experiencing a**  
17 **shortfall of 150,000, isn't it likely that there are**  
18 **other gate stations that are also experiencing a**  
19 **shortfall of some sort?**

20           A. Not necessarily.

21           **Q. And why not?**

22           A. Because some are located more closely to one  
23 gate station -- feed one gate station more exclusively  
24 than the others, and you can't necessarily -- you can't  
25 move the gas backwards on other pipelines to get it to a

1 different location, because that's where it's flowing  
2 to. Or the disruption could be just upstream of the  
3 gate station and you're not able to reroute the gas to  
4 where it needs to be.

5           Each one is so different and feeds --  
6 obviously, Northern Utah has less of a population, at  
7 least currently, than Salt Lake. We have a couple that  
8 feed Salt Lake that one could take, up to its maximum  
9 capability, more gas, but it couldn't necessarily take  
10 all of the shortfall of the other one. That's why we  
11 have so many flowing to Salt Lake City currently.

12           **Q. Okay. And then looking at this, it looks as**  
13 **though that the sort of gate station furthest from the**  
14 **load center, at least the one in Utah, is the Hyrum gate**  
15 **that is going north; is that right?**

16           A. Yes.

17           **Q. Okay. Do you know what the largest shortfall**  
18 **the company's experienced at the Hyrum gate is?**

19           A. I do not.

20           **Q. Do you know what the current capacity of the**  
21 **Hyrum gate is?**

22           A. I do not, but there's some engineers coming up  
23 that will be able to answer that question.

24           **Q. We can ask them. But what I can't ask them is**  
25 **-- well, maybe I can. But what I think you're probably**

1 more positioned to answer is: In the event of a  
2 shortfall at Hyrum, would there also be shortfalls at  
3 other gate stations along that distribution system, or  
4 would it -- is it possible for it to experience -- it be  
5 the only gate station experiencing that shortfall?

6 A. It is possible.

7 Q. And I know you don't know the capacity, but is  
8 it possible for the Hyrum gate station to experience a  
9 150,000 decatherm shortfall?

10 A. I don't believe it's quite that big, but  
11 potentially.

12 Q. Yeah. I don't think it is currently, but I  
13 think there may be some --

14 A. Expansion on the way, yeah.

15 Q. Right. Okay. And if the Hyrum gate were to  
16 experience a 150,000 decatherm shortfall, would there be  
17 shortfalls that are experienced elsewhere on the system  
18 as well?

19 A. If you look at the map, it might be the easiest  
20 way to explain it.

21 Q. That's why I brought it out.

22 A. So you see Whitney Canyon just to the right?

23 Q. Yeah.

24 A. So Whitney Canyon might be directed to Hyrum  
25 gate. If something happens at Whitney Canyon or

1 anything along that line between Whitney Canyon and  
2 Hyrum, there's no way that it can be solved. You know,  
3 that gas can't necessarily be redirected.

4 But we also have a lot of communication,  
5 for lack of a better word, between -- if you look at  
6 Payson gate, down below, this doesn't have our system on  
7 it. That's kind of the disadvantage of it.

8 **Q. I looked for a map that had your system, trust**  
9 **me.**

10 A. So if you draw the line between, you know, the  
11 Payson and Little Mountain, as you know, we have gas  
12 service during that -- during those places or between  
13 Payson and Salt Lake City, maybe, even though that's not  
14 a gate station. And you can have some communication  
15 between them and feed the gas north and south, if that  
16 makes sense. They call it a null point.

17 So sometimes the gas would be fed south  
18 towards Payson, and sometimes the gas would be fed north  
19 from Payson, and where it -- where the two meet moves,  
20 depending on load. I'm not an engineer, so I probably  
21 don't have the description exactly right. But there is  
22 a way to help some of them out to a certain point, but  
23 there are also situations where some gas supply can't  
24 be -- it, you know, is a one-to-one relationship because  
25 of transportation and other reasons.

1 MR. RUSSELL: Okay. Fair enough. Thank  
2 you very much. I appreciate that.

3 THE WITNESS: No problem.

4 COMMISSIONER LEVAR: Why don't we take a  
5 break at this point and move to redirect after a break?  
6 So why don't we return by that clock at 1:15?

7 We'll be in recess.

8 (A lunch recess was taken.)

9 (Reporter Rashell Garcia begins,)

10 COMMISSIONER LEVAR: Okay. We're back on  
11 the record. Ms. Faust, you're still under oath. At  
12 this point, we'll go to any redirect.

13 REDIRECT EXAMINATION

14 BY MS. NELSON-CLARK:

15 Q. Ms. Faust, I want to take you back to some of  
16 the questions you received from Mr. Snarr. And he was  
17 referring to an exhibit in your testimony. Do you  
18 recall him asking you about the probability of a  
19 landslide or freeze-off or a plant freeze-off? Do you  
20 remember that?

21 A. Yes.

22 Q. And in doing that analysis, I wanted to  
23 clarify, these are not hypothetical events, these are  
24 events that have actually occurred; isn't that right?

25 A. That's correct.

1 Q. And they occurred but perhaps not on a design  
2 peak day. Is that also correct?

3 A. Yes.

4 Q. Are you comfortable -- as the person  
5 responsible for gas supply at Dominion Energy, are you  
6 comfortable continuing moving forward in the future  
7 relying on the hope that it does not occur -- that those  
8 events don't occur on a Design Day?

9 A. I am not.

10 Q. I don't have anything else.

11 COMMISSIONER LEVAR: Thank you. Any  
12 questions about the redirect, Mr. Jetter, or Ms. Schmid?

13 MR. JETTER: I have no questions.

14 COMMISSIONER WHITE: No questions.

15 COMMISSIONER LEVAR: Mr. Snarr?

16 CROSS-EXAMINATION

17 BY MR. SNARR:

18 Q. I have one. With response to the question you  
19 just answered, have you -- has the company determined a  
20 risk probability that they can assign to the possibility  
21 of those shortfalls occurring that we talked about on  
22 the Design Day?

23 A. They have not.

24 Q. Thank you.

25 COMMISSIONER LEVAR: Mr. Russell?

1 MR. RUSSELL: Thank you, Mr. Chairman. No  
2 questions.

3 COMMISSIONER LEVAR: Okay. Commissioner  
4 Clark?

5 COMMISSIONER CLARK: Regarding the  
6 probability that Mr. Snarr just addressed, why wouldn't  
7 the company evaluate these risks from a probabilistic  
8 perspective?

9 A. My opinion is it's not -- they're not able to  
10 be predicted and therefore there's not a probability  
11 that can be assessed. There's too many other factors  
12 that are not controllable that go into them.

13 Q. And regarding the industry practice in this  
14 area, do you have any awareness of that? Do you have a  
15 basis for informing us as to whether or not that kind of  
16 analysis is routinely done in the industry generally or  
17 not?

18 A. I'm not aware of that kind of analysis being  
19 done.

20 Q. I just have a question about the operational  
21 aspects of preventing transportation customers from  
22 receiving gas when it's most precious. So just -- let's  
23 just assume that the LNG plant exists and that there is  
24 an imminent condition that the company perceives that  
25 will result in every therm, every molecule being

1 necessary to serve the sales customers.

2                   And that -- so, operationally, what would  
3 be required to assure that transportation customers  
4 couldn't take the gas even if they were willing to  
5 accept the penalties for doing so? Because your desire  
6 to assure that supply for sales customers under these  
7 conditions that I am hypothesizing would make it  
8 advisable to make the physical -- provide the physical  
9 assurance that it would be available. How would you do  
10 that?

11           A. They'd physically turn the gas off at the tap  
12 between our system and the customer's system meter.

13           Q. And that would involve action at roughly how  
14 many locations? And is the process just turning a  
15 wrench and we're done or is there anything more to it  
16 than that?

17           A. That's my understanding, that there's a turning  
18 of the wrench. As far as multiple locations, I wouldn't  
19 anticipate multiple transportation customers using the  
20 gas. And so we have a way of monitoring their usage on  
21 a real time basis. And we can target the one or two  
22 that might be using it and deploy operation personnel to  
23 those facilities. And we have enough operational  
24 personnel, I don't think that would be an issue.

25           Q. Thank you.



1 COMMISSIONER LEVAR: Mr. White?

2 COMMISSIONER WHITE: I have no questions.

3 Thanks.

4 MR. LEVAR: I just have one. And I know  
5 everybody loves hypothetical questions. I think this is  
6 mostly hypothetical but not entirely. Could you  
7 identify one or a few locations on the system where an  
8 outage caused by something similar to what caused the  
9 Monticello and Coalville outages could occur that could  
10 also be served by the proposed -- sorry, proposed LNG  
11 facility in central Utah?

12 A. Sure. So if there were issues at the gate --  
13 any of the current gate stations that we have,  
14 especially specifically Little Mountain, which feeds  
15 over to Emigration Canyon, if there was an issue  
16 upstream of that, we would be able to bring on an LNG  
17 facility and immediately fill that need. And that's the  
18 same with all the other city gates and also Kern River  
19 city gates. If there were issues there, we could  
20 supplement it.

21 COMMISSIONER LEVAR: So that the types of  
22 errors that led to the outages in Monticello and  
23 Coalville could occur at any of those gates also?

24 A. Yes, potentially.

25 COMMISSIONER LEVAR: And how many customers

1 at those locations would be affected?

2 A. As far as Little Mountain or --

3 MR. LEVAR: Yes, for an example.

4 A. So, depending on the day, you know, and how  
5 much load there is, different amounts of customers are  
6 served from there, but we would assume that the gas  
7 could be rerouted from other nearby -- Sunset and other  
8 -- Payson and other locations like we talked about  
9 earlier. So any shortfall that could be put right into  
10 the heart of the demand center from the LNG facility  
11 could offset, whether it was a mechanical failure or a  
12 locking -- a freezing of a meter or anything like that  
13 that could happen. They have since changed the  
14 Coalville meters, you're probably aware, and it's not  
15 exactly the same mechanics as the large city gate  
16 stations. But any mechanical failure or upstream  
17 disruption of any kind, including freeze-offs, or it  
18 could be a physical malfunction upstream, that LNG  
19 facility would be able to supplement shortages from any  
20 of the city gates.

21 COMMISSIONER LEVAR: Thank you. That's all  
22 I have. Thank you for your testimony today.

23 We'll go back to the utility for your next  
24 witness.

25 MR. SABIN: Thank you. DEU calls Bruce

1 Paskett as its next witness.

2 COMMISSIONER LEVAR: Mr. Paskett, do you  
3 swear to tell the truth?

4 A. I do.

5 BRUCE L. PASKETT,  
6 called as a witness, having been first duly sworn, was  
7 examined and testified as follows:

8 MR. LEVAR: Thank you.

9 MR. Paskett: Thank you.

10 DIRECT EXAMINATION

11 BY MR. SABIN:

12 Q. Mr. Paskett, could you please state your full  
13 name for the record?

14 A. My name is Bruce L. Paskett.

15 (Briefly off the record.)

16 Q. Mr. Paskett, have you submitted testimony in  
17 this matter?

18 A. I did submit testimony, direct testimony, in  
19 this matter.

20 Q. And it's -- I have that testimony marked as  
21 Exhibit 6.0, DEU Exhibit 6.0, with one exhibit attached  
22 to that which is marked as Exhibit 6.01. Do you have  
23 those documents there with you?

24 A. I have Exhibit 6.0 in front of me.

25 Q. Okay. Did you prepare that testimony?

1 A. I did.

2 Q. Do you have any corrections to that testimony?

3 A. I do not.

4 Q. Do you adopt that testimony today here as you  
5 are appearing as a witness?

6 A. I do.

7 Q. Okay. We move to admit Exhibits -- oh, I guess  
8 I should ask, Exhibit 6.01, which is attached to Exhibit  
9 6.0, did you also prepare that?

10 A. I did.

11 Q. And do you have any corrections to Exhibit  
12 6.01?

13 A. I do not.

14 Q. DEU moves to admit Exhibits 6.0 and 6.01.

15 COMMISSIONER LEVAR: If anyone objects to  
16 that motion, please indicate. I'm not seeing any  
17 objection, so the motion is granted.

18 Q. Mr. Paskett, have you prepared a summary of  
19 your testimony you've submitted in this matter?

20 A. Yes, I have.

21 Q. Would you please provide that to the  
22 commission?

23 A. Thank you. Good afternoon, Mr. Chair and  
24 members of the commission. My name is Bruce Paskett.  
25 I'd like to begin my summary testimony by providing a

1 brief overview of my background and experience. I am a  
2 registered professional engineer in the State of Oregon  
3 with over 36 years of experience in the natural gas  
4 industry. I was employed for 31 years at Northwest  
5 Natural Gas with headquarters in Portland, Oregon.

6 Northwest Natural is a local distribution  
7 company or LDC about the same size as Dominion Energy  
8 Utah. Northwest Natural's facilities include  
9 transmission and distribution pipeline systems and also  
10 on-system underground storage in two LNG plants.

11 During my tenure with Northwest Natural, I  
12 held a number of different management positions  
13 including manager of engineering, manager of corporate  
14 security, chief engineer, manager of code compliance,  
15 and principal compliance engineer. At various times I  
16 had the direct responsibility or was involved in the  
17 design, construction, operations, maintenance, integrity  
18 management and regulatory compliance activities for  
19 Northwest Natural's transmission and distribution  
20 systems.

21 In addition, I was involved with supporting  
22 the company's underground storage facility and two  
23 on-system LNG plants where Northwest Natural liquefied  
24 and vaporized LNG.

25 I was involved as a member of the company's

1 emergency operations committee that responded to various  
2 natural gas emergencies, including extreme weather  
3 events and upstream supply disruptions due to issues  
4 such as catastrophic pipeline failures.

5           While at Northwest Natural, I also had the  
6 opportunity for significant involvement in natural gas  
7 professional associations, regulatory workshops,  
8 including NARUC workshops and conferences and federal  
9 and state pipeline safety regulatory compliance and rule  
10 making initiatives.

11           I have also participated in American Gas  
12 Association, or AGA, operations committees for nearly 36  
13 years. AGA represents the 200 largest LDCs in the  
14 nation, such as Dominion Energy Utah. In addition, from  
15 2009 to 2013, I was a loaned executive to the AGA during  
16 the time period following a significant number of  
17 serious pipeline incidents, including the San Bruno  
18 tragedy.

19           During my tenure as a loaned executive, I  
20 supported AGA in the 2011 Congressional Pipeline Safety  
21 Reauthorization and numerous PHMSA pipeline and safety  
22 rule makings.

23           In 2014, I joined Structural Integrity  
24 Associates, Inc. as chief regulatory engineer. In my  
25 current practice, I provide engineering consulting for

1 LDCs across the nation regarding regulatory compliance  
2 and best practices on a broad range of natural gas  
3 design, construction, operations, maintenance and  
4 integrity management matters.

5                   Based on my 36 years of industry  
6 experience, my participation in AGA operations  
7 committees, my tenure as an AGA loaned executive, and my  
8 practice with Structural Integrity Associates, I've  
9 acquired extensive knowledge and experience related to  
10 natural gas LDCs across the nation.

11                   I've been retained by DEU to provide an  
12 expert review of assessment of the reliability needs for  
13 the DEU system and the company's evaluation of available  
14 supply reliability options.

15                   In this capacity, I assessed the issues  
16 driving the company's desire for supply reliability  
17 solutions and the resources that could be added to the  
18 company's gas supply portfolio to improve the safety and  
19 reliability of service to sales customers during cold  
20 weather and Design Day conditions.

21                   Historically and recently, DEU has  
22 experienced disruptions of contracted gas supplies  
23 during cold weather events when temperatures were warmer  
24 than the Design Day. Since a hundred percent of DEU's  
25 gas supply portfolio comes from off-system sources which

1 are outside the company's piping system, the supply  
2 shortfalls occur due to events that are outside the  
3 company's control.

4           Based on the frequency and nature of these  
5 supply disruptions, DEU is justifiably concerned that it  
6 will be unable to provide safe and reliable service to  
7 sales customers during winter and cold weather  
8 conditions.

9           In addition to DEU's experience with supply  
10 shortfalls, the company also examined industry operating  
11 experience from other system operators as required by  
12 code regarding instances of loss of reliability of  
13 service during winter cold weather operating conditions.

14           In Ms. Faust's direct testimony, which is  
15 DEU Exhibit 2.0, she discusses the February 2011 cold  
16 weather event that resulted in the interruption of  
17 service to more than 40,000 customers in New Mexico and  
18 Arizona due to "widespread wellhead, gathering system  
19 and processing plant freeze-offs and hampered repair and  
20 restoration efforts."

21           I also address this event in my testimony.  
22 In response to this event, Southwest Gas Corporation  
23 examined their gas supply portfolio and exclusive  
24 reliance on a hundred percent off-system supplies and  
25 obtained pre-approval from the Arizona commission to



1 construct an on-system LNG storage facility, and is  
2 currently constructing that facility which is scheduled  
3 for completion in 2019.

4 In addition, in our respective testimonies,  
5 Ms. Faust and I also discuss a very recent example of  
6 loss of supply reliability during winter cold weather  
7 conditions.

8 In October 2018, the 36-inch transmission  
9 pipeline that serves Fortis, BC ruptured north of Prince  
10 George, British Columbia. The 36-inch transmission  
11 pipeline and a parallel 30-inch transmission pipeline  
12 had to be shut down, severely limiting the supply of  
13 natural gas to the Fortis, BC territory. Fortis, BC was  
14 able to avoid a catastrophic customer service outage in  
15 part by utilizing gas supplies from the two on-system  
16 Fortis, BC LNG plants.

17 Based on DEU's historical experience and on  
18 significant recent events in Mexico, Arizona and British  
19 Columbia, it's abundantly clear that interruptions of  
20 off-system gas supplies during cold weather are not  
21 hypothetical events and that the consequences can be  
22 significant.

23 In addition, based on my personal  
24 experience with Northwest Natural Gas, supply  
25 disruptions are a very real and serious threat to LDCs.

1 From February 1989 to December 2003, Northwest Natural  
2 experienced significant interruptions of gas supplies  
3 from the interstate pipeline system on at least seven  
4 different occasions.

5 In DEU's case it has concluded that the  
6 types of upstream events it has experienced, if  
7 replicated during colder weather conditions, have the  
8 potential to cause significant gas supply problems and  
9 result in a significant loss of service.

10 The company's unchallenged system network  
11 modeling shows that a supply disruption to a demand  
12 center could result in a loss of service of up to  
13 650,000 residential, commercial and industrial sales  
14 customers that rely on natural gas for heating and other  
15 needs. This interruption of service could result in  
16 serious threats to life, safety and substantial property  
17 damage.

18 Based on my discussions with DEU personnel  
19 and my review of company information, the company is  
20 serious about providing safe and reliable service to its  
21 customers and is driven by its legislative mandate to  
22 provide safe and reliable gas service.

23 To identify the most prudent and cost  
24 effective alternative for adding additional resources to  
25 maintain system supply, reliability and pressure support

1 during cold weather conditions and other emergency  
2 events, DEU issued a request for proposal, or RFP, to  
3 outside parties on January 2nd, 2019 seeking proposals  
4 for supply reliability resource to meet specified  
5 performance requirements detailed in the RFP.

6           The company utilizes standard RFP processes  
7 to solicit proposals from all known parties that might  
8 be able to provide resources, including gas suppliers,  
9 storage providers, and upstream pipelines.

10           The RFP produced six options in addition to  
11 the option of a DEU owned and operated on-system LNG  
12 facility. The company conducted a comprehensive supply  
13 reliability evaluation, which is DEU Exhibit 3.03, to  
14 identify an additional supply source to maintain system  
15 safety, reliability and adequate system pressures during  
16 periods of supply disruption. In the supply reliability  
17 evaluation, the company summarized the analysis  
18 conducted for the options generated by the RFP.

19           In addition, in the supply reliability  
20 evaluation and in the supply reliability risk analysis,  
21 which is DEU Exhibit 2.04, the company identified a  
22 range of known risks and threats to reliable delivery of  
23 contracted off-system gas supplies to the DEU  
24 distribution system.

25           These threats and risks include well

1 freeze-offs, processing plant and compressor station  
2 shutdowns, landslides, washouts, flooding, earthquakes,  
3 human error, third-party excavation damage and cyber  
4 attacks.

5           In addition, there are other threats  
6 contained in industry consensus documents that are  
7 relevant to the integrity of pipelines that deliver  
8 contracted off-system gas to the DEU system. These  
9 threats include internal corrosion, external corrosion,  
10 stress corrosion cracking, and manufacturing and  
11 construction defects.

12           I've reviewed the company's supply  
13 reliability resource RFP, supply reliability evaluation,  
14 and supply reliability risk analysis in detail. Based  
15 on my extensive experience in the natural gas industry  
16 for over 36 years, it's my opinion that, one, the  
17 process engaged in by the company to assess it's  
18 reliability needs has been conducted in a reasonable  
19 manner.

20           DEU has considered not only company  
21 experience with off-system supply shortfalls but has  
22 also considered and evaluated industrywide experience  
23 consistent with my expectations for a prudent LDC. DEU  
24 has confirmed the need for an additional supply  
25 resource.

1 Two, the supply reliability evaluation and  
2 supply reliability risk analysis are comprehensive and  
3 were competently performed. The supply reliability  
4 evaluation and supply reliability risk analysis  
5 appropriately identify a range of legitimate risks and  
6 threats through the reliable delivery of off-system gas  
7 supplies to the DEU system.

8 Three, based on recent disruptions of  
9 contracted off-system gas supplies during cold water  
10 events that were much warmer than Design Day  
11 temperatures, it would be imprudent for the company to  
12 fail to secure an additional gas resource that's highly  
13 reliable in cold weather conditions.

14 Four, the RFP process to identify the most  
15 prudent and cost effective alternative for adding  
16 additional supply resources was performed in a  
17 reasonable and competent manner.

18 Five, the supply reliability evaluation  
19 objectively evaluates the options identified in the RFP  
20 along with the option of a company owned LNG facility  
21 for the need identified by the company.

22 Six, an on-system DEU owned LNG facility  
23 provides the highest reliability of any identified  
24 option and significant advantages as compared to any of  
25 the other options.

1                   Seven, given that the company already  
2 relies 100 percent on off-system supply sources that are  
3 subject to numerous supply risks, it is my opinion that  
4 the company's decision to add an on-system supply  
5 reliability solution is not only prudent but the  
6 appropriate decision.

7                   Supply diversity is of critical paramount  
8 consideration when dealing with the question of supply  
9 reliability.

10                  Finally there are significant advantages to  
11 having an on-system LNG storage facility from a system  
12 reliability perspective. During my 31 years employed at  
13 Northwest Natural, I was deeply involved in the  
14 operations of the company, including emergency  
15 operations. Northwest Natural's off-system gas  
16 supplies, like the company's, are delivered through an  
17 off-system pipeline.

18                  As I detailed in my direct testimony, there  
19 were at least seven occasions from February 1989 to  
20 December 2003 when the interstate transmission pipeline  
21 that provides natural gas transportation service to  
22 Northwest Natural service territory experienced severe  
23 operational issues or catastrophic pipeline failures  
24 that resulted in extreme flow restrictions, operational  
25 flow orders, restricting the delivery of contracted gas

1 to Northwest Natural's service territory.

2 Many of these failures occurred during  
3 wintertime operating conditions. Northwest Natural's  
4 ability to draw gas from the company's on-system storage  
5 prevented the interruption of service to thousands or  
6 tens of thousands of customers. On-system LNG storage  
7 provides significant system reliability benefits that no  
8 other available option can match.

9 In summary, I've reviewed the DEU supply  
10 reliability resource RFP, supply reliability evaluation,  
11 and supply reliability risk analysis. In my expert  
12 opinion, the company has conducted a thorough and  
13 competent RFP process and competent evaluation of the  
14 options identified in the RFP, along with the option of  
15 a company owned LNG facility of the need identified by  
16 the company to improve the reliability of supply during  
17 cold water operating conditions.

18 Of the options identified through the RFP  
19 process and the DEU owned LNG facility option, I agree  
20 that the on-system DEU LNG facility clearly provides the  
21 most beneficial option to improve DEU's supply  
22 reliability during cold weather operating conditions.

23 That concludes my summary of testimony.  
24 Thank you.

25 MR. SABIN: Thank you, Mr. Paskett.

1 Mr. Paskett is now available for cross-examination.

2 COMMISSIONER LEVAR: Thank you. Anything  
3 from the division?

4 CROSS-EXAMINATION

5 BY MR. JETTER:

6 Q. I do have a few brief questions. Good  
7 afternoon.

8 A. Good afternoon.

9 Q. I suppose I'll start out with, you discussed a  
10 loss of service to customers in New Mexico and Arizona  
11 in 2011, and that Southwest Gas Company had received  
12 approval to install a liquid natural gas facility south  
13 of Tucson, I believe is the location of that. Is that  
14 correct?

15 A. I'm not sure of the exact location, but I  
16 discussed the rest of it, correct.

17 Q. Okay. And did you investigate what New Mexico  
18 Gas Company did as a response?

19 A. I did not.

20 Q. Okay. You're not -- I guess I won't ask any  
21 further questions about that if you're not aware.

22 In your review -- changing gears here a  
23 little bit -- of the supply reliability study from the  
24 company, did you review any probabilistic analysis of  
25 any of those types of risks?



1           A. I don't believe that there was a probabilistic  
2 analysis that was performed. In my opinion, it is very,  
3 very difficult, if not impossible, to do a probabilistic  
4 analysis.

5                         Just for the record, PHMSA defines risk as  
6 probability times consequences. And so in some cases,  
7 it may be the probability is low but these are high  
8 consequence events. So I would categorize these as very  
9 high risk types of events.

10           **Q. And so if you don't know the probability, is it**  
11 **fair to say then you can't meaningfully calculate the**  
12 **risk?**

13           A. I don't think you can establish a numerical  
14 number for the risk. I think what you do is look around  
15 the industry and look at the industry experience, which  
16 is what DEU has done, and draw your conclusions from  
17 that, which is, those kinds of interruptions are  
18 happening everywhere around the system.

19                         And so it's very difficult, yes, to have an  
20 absolute number to it, but you take actions based on the  
21 threats that are identified, which is what's required by  
22 federal code.

23           **Q. And so how do you know that it was an**  
24 **appropriate decision to choose 150,000 decatherms as**  
25 **opposed to 300 or 500?**

1           A. I think that that is a question that should be  
2 asked of another witness. That was not my input.

3           **Q. Okay. Thank you. I have no further questions.**

4           COMMISSIONER LEVAR: Thank you. Mr. Snarr?

5           MR. SNARR: I have no questions.

6           COMMISSIONER LEVAR: Mr. Russell?

7           MR. RUSSELL: No questions. Thank you.

8           COMMISSIONER LEVAR: Mr. Sabin, any  
9 redirect?

10          MR. SABIN: None. Thank you.

11          COMMISSIONER LEVAR: Commissioner White?

12          COMMISSIONER WHITE: I'm just curious, any  
13 of the other LDCs that were evaluated in kind of  
14 comparing the costing, has there ever been a driver  
15 associated with the difference in topography or weather?  
16 Is that ever a part of this? I'm just asking that  
17 because obviously Northwest Natural has a different, you  
18 know, climate, topography, etcetera. Is that ever a  
19 consideration in the need for such a facility?

20          A. Good question. I think it's on a case by case  
21 basis, Commissioner. I do know that there are other  
22 LDCs that are building. We already mentioned Southwest  
23 Gas. Puget Sound Energy are in the process of  
24 developing an LNG plant in Washington as we speak for  
25 the same purposes, which is supply reliability.

1                   So I think climate and supply resources,  
2 there's a lot of factors that go into that decision and  
3 equation. Was that responsive?

4                   COMMISSIONER WHITE: I'm fine. That's all  
5 the questions I have.

6           A. Okay.

7                   COMMISSIONER LEVAR: Mr. Clark?

8                   COMMISSIONER CLARK: Mr. Paskett, you  
9 addressed the RFP and your examination of it. And the  
10 point is made in testimony that Kern River did not bid  
11 and did not offer a solution to the -- I'll call it the  
12 problem that the RFP was seeking a solution for.

13                   Just from your industry experience, would  
14 you have expected Kern River to provide a bid in this --  
15 in the context of the RFP parameters? Let's start with  
16 that question and then I've got a couple of follow-up.

17           A. Okay. Thank you for your question,  
18 Commissioner. In my opinion, the RFP casts a very wide  
19 net, so I'm certain that Kern River was aware of it. I  
20 am not surprised that they did not submit a bid because  
21 I don't believe that they were able to meet the criteria  
22 that was established in the RFP.

23                   So I'm not at all surprised because they're  
24 an interstate pipeline operator. And the time frame of  
25 this kind of a resource was very quick. And I don't

1 believe -- again, I'm not surprised that Kern River  
2 didn't bid.

3                   COMMISSIONER CLARK: So you referred to the  
4 criteria. And maybe time frame is one. Are there any  
5 other criteria that -- I'll just offer one. The  
6 delivery point, for example, is that a constraint that  
7 would have made it maybe difficult, maybe impossible for  
8 Kern River to participate?

9           A. Well, I would -- that's an excellent question.  
10 I would be speculating as to why they didn't submit a  
11 bid, Commissioner.

12                   COMMISSIONER CLARK: And I wouldn't -- I  
13 wouldn't want you to speculate as to their reasoning,  
14 but just from your experience, what would you do if  
15 you're an interstate pipeline and you're addressing  
16 this RFP? What criteria would have made it most  
17 challenging for you to participate? And is the point of  
18 delivery part of that equation or are there ways that  
19 that particular requirement could have been addressed  
20 commercially or some other way?

21           A. My personal opinion is that there probably  
22 isn't an effective way for an interstate pipeline like  
23 Kern River to have met all of the conditions because, as  
24 the time frame and their supply resources are located,  
25 as in testimony, hundreds of miles away from DEU's

1 service, plus there's the nomination cycle. So there  
2 is a lot of fundamental restrictions that would -- if  
3 I'm Kern River, I wouldn't think I could meet the  
4 criteria.

5 COMMISSIONER CLARK: Thanks for that  
6 elaboration. I appreciate it. So that concludes my  
7 questions.

8 COMMISSIONER LEVAR: I don't have any  
9 questions. Thank you for your testimony today.

10 A. Thank you very much.

11 MS. NELSON-CLARK: The company calls  
12 William Schwarzenbach.

13 COMMISSIONER LEVAR: Mr. Schwarzenbach, do  
14 you swear to tell the truth?

15 MR. SCHWARZENBACH: Yes, I do.

16 COMMISSIONER LEVAR: Thank you.

17 WILLIAM F. SCHWARZENBACH,  
18 called as a witness, having been first duly sworn, was  
19 examined and testified as follows:

20 DIRECT EXAMINATION

21 BY MS. NELSON-CLARK: :

22 **Q. Could you please state your full name and**  
23 **business address for the record.**

24 A. Yes. My name is William Frederick  
25 Schwarzenbach, the third. My business address is 333

1 State Street, Salt Lake City, Utah.

2 Q. And what position do you hold with the company,  
3 Mr. Schwarzenbach?

4 A. I am the manager of gas supply for Dominion  
5 Energy Utah.

6 Q. Did you file direct testimony in this docket,  
7 which is DEU Exhibit 3.0 with three attached exhibits,  
8 No. DEU 3.01 through 3.03?

9 A. Yes, I did.

10 Q. And were those documents prepared by you or  
11 under your direction?

12 A. Yes, they were.

13 Q. And do you adopt the contents of those  
14 documents as your testimony today?

15 A. Yes, I do.

16 Q. Did you also file rebuttal testimony marked as  
17 DEU Exhibit 3.0R?

18 A. Yes, I did.

19 Q. And do you also adopt that document as your  
20 testimony today?

21 A. I do.

22 Q. The company moves to admit Mr. Schwarzenbach's  
23 pre filed direct testimony, DEU Exhibit 3.0 and the  
24 accompanying Exhibits 3.01 through 3.03, as well as his  
25 rebuttal testimony marked as DEU Exhibit 3.0R.

1 COMMISSIONER LEVAR: If anyone objects to  
2 that motion, please indicate to me. I'm not seeing any  
3 objections, so the motion is granted.

4 **Q. Thank you. Mr. Schwarzenbach, will you please**  
5 **summarize your testimony?**

6 A. Yes. Thank you. Last year in Docket No.  
7 18-057-03 and after extensive analysis, the company  
8 proposed to build a DEU owned LNG facility as a resource  
9 to provide supply reliability for DEU's customers and  
10 mitigate supply shortfalls and avoid loss of service.

11 In its order in that docket the commission  
12 concluded, "We cannot now properly evaluate the  
13 reasonableness of the LNG facility as a means of  
14 improving supply reliability because we do not have  
15 adequate assurance other more cost effective positions  
16 are not available."

17 In my testimony, I describe the process  
18 used to identify all available resources and the  
19 evaluation completed to determine the most cost  
20 effective and reliable options to provide supply  
21 reliability for DEU customers.

22 To provide adequate assurance that all  
23 reasonable and cost effective potential options to  
24 provide supply reliability for DEU customers have been  
25 considered, the company issued a well advertised public

1 solicitation for proposals to identify any potential  
2 resource that may be available.

3 DEU prepared a detailed request for  
4 proposal, or RFP, that explained in detail the purpose  
5 and scope of the RFP, identified the requirements of a  
6 qualifying proposal, provided DEU contact information,  
7 identified key dates, outlined supply resource  
8 requirements, explained the criteria that would be used  
9 for evaluation, described the required proposal content,  
10 requested the information on the ability to extend DEU's  
11 service to remote locations or other factors determined  
12 to be relevant, described the process by which DEU could  
13 revise the RFP, explained confidentiality commitments,  
14 provided disclaimers, explained DEU commitments to equal  
15 opportunity employment and affirmative action, noted the  
16 private proposal opening process, and noticed a plan  
17 respondent conference.

18 This RFP was reviewed by both the Office of  
19 Consumer Services and the Division of Public Utilities  
20 before it was issued and feedback provided was  
21 incorporated into the final RFP.

22 The RFP was published in Platts Gas Daily,  
23 an industry publication normally read daily by most  
24 participants in the natural gas market. DEU also  
25 directly sent the RFP to all known gas suppliers in the



1 local market and the upstream pipeline providers,  
2 including Kern River Gas Transmission and Dominion  
3 Energy Questar Pipeline.

4 No other potential providers have been  
5 identified that did not receive the RFP. In response to  
6 this RFP, DEU received proposals from three respondents.  
7 Magnum Energy Midstream provided three different options  
8 in its proposal. Prometheus Energy provided two  
9 different options in its proposal. United Energy  
10 Partners provided one option in its proposal. DEU also  
11 considered the potential DEU owned LNG facility in its  
12 evaluation of options.

13 DEU's evaluation process was intended to  
14 identify a supply reliability option that, taking into  
15 account all relevant factors, will allow DEU to provide  
16 safe and reliable service to its customers at the lowest  
17 reasonable cost.

18 A 26 page summary of this evaluation is  
19 included with my pre file direct testimony at DEU Highly  
20 Confidential Exhibit 3.03. The company considered a  
21 number of price and non price factors in evaluating all  
22 of the options, including the following: One, whether  
23 the proposal satisfied the operational and in-service  
24 requirements contained in the RFP, including the ability  
25 to deliver supply on an as-needed basis.

1 Two, total annual customer cost of the  
2 proposal. Three, the long and short-term impacts of the  
3 proposal, including any operational considerations.  
4 Four, technical, operational and financial viability of  
5 the proposal. Five, the impact of the proposed delivery  
6 location on DEU system, including any resulting costs or  
7 benefits. Six --

8 (Briefly off the record.)

9 COMMISSIONER LEVAR: Sorry, Mr.  
10 Schwarzenbach, I think the streaming is not picking you  
11 up. Is your microphone on?

12 A. Yes, it is.

13 COMMISSIONER LEVAR: The green light is  
14 on?

15 Is that what -- the streaming, he's not  
16 being picked up on the streaming.

17 UNIDENTIFIED: We can't hear very well.

18 COMMISSIONER LEVAR: Sorry to interrupt  
19 your summary.

20 A. Can you hear me now? Should I start over?

21 COMMISSIONER LEVAR: Well, so apparently  
22 whoever is participating by listening to the streaming  
23 does not have your summary, any of your summary.

24 A. I'd be happy --

25 COMMISSIONER LEVAR: I'll leave that to

1 you and your attorneys whether you repeat your summary  
2 for purposes of the stream. We have it in the  
3 transcript.

4 COMMISSIONER CLARK: We could hear it.

5 COMMISSIONER LEVAR: We could hear it in  
6 the room, yes.

7 A. All right.

8 MR. SABIN: If you really want to --

9 A. I can do either way. Okay. Let me see where  
10 I was. I think I was six -- or, actually, let me go to  
11 five. The impact of the proposed delivery location on  
12 DEU's system, including any resulting costs or  
13 benefits.

14 Reliability of the proposal, including but  
15 not limited to, any operational reliability benefits and  
16 design redundancy. Seven, the risks addressed and/or  
17 presented by the proposal. Eight, the financial impact  
18 on DEU, if any, other than the total annual cost to  
19 customers. Nine, other identified benefits or risks  
20 associated with the proposal. And, ten, other factors  
21 that were determined to be relevant, including  
22 additional benefits such as providing peak hour services  
23 or providing gas services to remote communities.

24 Based on the analysis of each option  
25 available and an evaluation of risks, benefits and costs

1 of each option, the DEU owned LNG facility is the lowest  
2 reasonable cost and most reliable option to offset  
3 anticipated supply shortfalls.

4 It is a supply reliability resource located  
5 on the DEU system which reduces risks associated with  
6 supply issues such as well freeze-offs and plant shut-  
7 downs and also reduces risks associated with  
8 transporting the gas, such as earthquakes, landslides  
9 and third-party damage.

10 The company recommends that the commission  
11 find that construction and operation of an on-system DEU  
12 owned LNG facility is just and reasonable and in the  
13 public interest and approve the company's application in  
14 this matter.

15 MS. NELSON-CLARK: Mr. Schwarzenbach is  
16 available for cross-examination and commission  
17 questions.

18 COMMISSIONER LEVAR: Thank you. Mr. Jetter  
19 or Ms. Schmid, do you have any questions?

20 MR. JETTER: I have a few brief questions.

21 CROSS-EXAMINATION

22 BY MR. JETTER:

23 Q. Good afternoon.

24 A. Good afternoon.

25 Q. Were you involved in the RFP communications

1 back and forth between Dominion Energy and the Magnum  
2 Energy Partners, called Magnum?

3 A. I was slightly involved, but the reality is we  
4 went -- since we did this as a standard RFP process, we  
5 went through our contracting department and had all  
6 correspondence go through them. We did hear about some  
7 of the questions. So, depending on which particular  
8 question and correspondence you're referring to, I may  
9 or may not have been involved.

10 Q. Okay. What I'd like to know a little bit more  
11 about is the costs that were discussed earlier. I'm  
12 going to stay out of confidential territory here and  
13 just ask, do you know if those costs for the facility  
14 upgrades for the bidders' projects that may have been  
15 connected at a point that was other than where desired  
16 by Dominion, those costs for the upgrades, were those  
17 calculated by Dominion and then given to the bidders?  
18 Or do you know if the bidders were left to calculate  
19 those upgrade costs themselves?

20 A. We did not give those estimates to the bidders  
21 because the estimates were really dependent on what the  
22 bid said, so where the bid was going to deliver the gas.  
23 So it was really dependent on each particular bid.

24 And the reality is, the best person to ask  
25 is probably Mike Gill on how all that was developed. I

1 was not responsible for developing those costs.

2 In terms of the one we talked about  
3 earlier, I did review the bid that was proposed and felt  
4 it was fairly clear as to what was included in the bid  
5 and what was not.

6 **Q. Okay. That's the only question I have. Thank**  
7 **you.**

8 COMMISSIONER LEVAR: Thank you. Mr. Snarr,  
9 do you have any questions?

10 MR. SNARR: Yes, I have a few questions.  
11 Thank you.

12 CROSS-EXAMINATION

13 BY MR. SNARR:

14 **Q. In your rebuttal testimony at lines 18 through**  
15 **21, you attempt to make distinctions between long-term**  
16 **and short-term solutions the DEU used for reliability**  
17 **means. Will you look at that?**

18 A. Can you repeat which line numbers?

19 **Q. 18 through 21.**

20 A. Okay. And what was your question regarding  
21 that?

22 **Q. You seem to make distinctions between long-term**  
23 **and short-term solutions to the identified DEU**  
24 **reliability means; is that right?**

25 A. Yes.

1           **Q. And considering the various reliability issues**  
2 **that were identified by witness Faust, I'd like you to**  
3 **consider some of the following questions: Does a well**  
4 **freeze-off require a short-term or a long-term**  
5 **solution?**

6           A. It's not a matter of whether it requires a  
7 short-term or long-term solution, it's a matter of which  
8 solutions are available. Unfortunately, a long-term  
9 solution isn't available to put into action today.

10                       So, yes, we are considering things on a  
11 short-term basis based on what is available for us to  
12 react to that today, whereas, any of the solutions that  
13 were provided in response to our RFPs, which are more  
14 long-term solutions, would not be available for us to  
15 use today. So we were forced to consider more stopgap  
16 type measures as well as what we want to do long-term.

17           **Q. And in using some of those short-term stopgap**  
18 **measures, you were successful in ensuring that gas**  
19 **supply would reach your retail customers in every**  
20 **distressed situation; isn't that right?**

21           A. I do not feel confident in saying that we would  
22 be able to do that during a Design Day. We have done it  
23 to this point but we have not seen a Design Day.

24           **Q. Now, we've talked about risk being probability**  
25 **times the consequences. Have you also heard the past is**

1 prolonged or we can learn something from history?

2 A. Yes. But I've also noted that in terms of --  
3 historical actuals are not necessarily a representation  
4 for what will happen exactly in the future.

5 Q. All right. Let's talk about plant shutdowns.  
6 There's various different kinds of plants that are  
7 connected to the upstream pipelines and facilities that  
8 serve DEU; is that right?

9 A. Yes, I'm aware.

10 Q. And some of those plants process the gas to --  
11 dehydrate the gas, right?

12 A. Yes, some of them.

13 Q. And some of them take out the sour gas  
14 component, which can be very serious, right?

15 A. Yes.

16 Q. And aren't there also plants that merely strip  
17 out the higher value ethanes?

18 A. Yes.

19 Q. Now, in that last circumstance, if we have a  
20 plant shutdown of that type of a processing plant, what  
21 might be a short-term solution for the availability of  
22 that gas supply?

23 A. Well, I could speculate, but I'm not the plant  
24 manager as to what they would do with that. I mean  
25 one -- if all they are doing is stripping out the



1 ethane, there is the possibility that they could  
2 continue to deliver the gas with a higher BTU content,  
3 but it depends on what caused the shutdown.

4           If it's a complete power failure at the  
5 facility, it doesn't matter what they were trying to do.  
6 If the facility can't run, they may not be able to  
7 continue to run gas through it, whether it's at a higher  
8 BTU content or at a lower BTU content with the ethane  
9 stripped out.

10           **Q. All right. Isn't it true that Dominion's**  
11 **evidence in this case only considers the proposed LNG**  
12 **facility as a possible solution to respond to many**  
13 **supply reliability issues without a presentation or**  
14 **comparison of other solutions that might also address**  
15 **those specific reliability issues?**

16           A. No, I don't agree with that at all. I think  
17 we've done a complete evaluation of every option that  
18 is available. We went through in the prior docket, the  
19 18-057-03 docket, we went through and evaluated all  
20 potential hypothetical type options that we could think  
21 of. And then, this past year, we put out an RFP to  
22 solicit from anybody who might have another option for  
23 them to present that option to us.

24           And we received a number of them and we  
25 considered all of those evaluated. So at this point, I

1 feel confident in saying, we've looked at every  
2 potential option we could think of and every potential  
3 option of others in the industry that might have the  
4 opportunity to provide us with something, we've looked  
5 at everything that they could provide as well.

6 So, I'm not sure what potential solutions  
7 you're talking about that somebody might have out there  
8 that they didn't present to us.

9 **Q. We can address those.**

10 A. Okay.

11 **Q. At line 27 of your rebuttal testimony you**  
12 **presume that DEQP pipeline capacity associated with**  
13 **the delivery of clay basin storage gas would be**  
14 **constrained on a Dominion Energy Utah Design Day; is**  
15 **that correct?**

16 A. Yes.

17 **Q. Now, have you sought DEQ capacity for any**  
18 **additional clay basin service to confirm with them**  
19 **whether their capacity is similarly constrained?**

20 A. Their pipeline capacity, I don't have to  
21 actually consult with them. Their available capacity is  
22 posted on their website. You can look to see how much  
23 available capacity they have. And they do not -- and I  
24 haven't looked today, but they do not currently have, to  
25 my knowledge, any available pipeline capacity that goes

1 through the Wasatch Front.

2                   So, in order to have available capacity on  
3 a peak day, we would have to contract for that. And  
4 right now, based on what's available on their pipeline,  
5 they don't have that capacity to contract to our  
6 system.

7           **Q. You also reviewed Kern River for the same kinds**  
8 **of questions about additional capacity availability?**

9           A. Kern River does have long-term capacity  
10 available. They are fully sold out on a short-term  
11 basis. So, looking right now, they do not have  
12 capacity available. Again, I have not checked it today  
13 so I would have to -- I would have to -- subject to  
14 check.

15                   But the problem with Kern River is they do  
16 not have direct access to storage. So, in order for us  
17 to get additional storage and provide that on Kern  
18 River, you would have to go through another pipeline  
19 such as Dominion Energy Questar Pipeline anyway.

20                   So, contracting for additional supply to  
21 reach the -- or additional capacity on Kern River to  
22 reach that storage isn't necessarily all that's going to  
23 be involved.

24           **Q. Did those circumstances you've just described**  
25 **give you any pause when you approached Kern River for**

1 **your peaking contract service the last couple of years?**

2 A. It does not because the peaking contract, they  
3 work through their -- they use line pack to provide that  
4 service. And they've been able to provide that service  
5 to us. It is a much different animal than what we're  
6 talking about here.

7 And, yeah, I have no doubt they have a FERC  
8 approved rate for that service and they're able to  
9 provide it. If they did not have a FERC approved rate,  
10 which they do not for any type of -- no notice service  
11 or anything like that, then I would question that  
12 service as well. But they do have a FERC approved  
13 rate.

14 And, again, I'd like to reiterate that Kern  
15 River had every opportunity to respond to our RFP with  
16 some type of solution. And they chose not to do so.  
17 They had -- they not only received directly from me the  
18 RFP, they participated in the bidders' conference.  
19 They were there and able to ask any questions they  
20 wanted.

21 And in reference to some of the other  
22 proposals that were actually sent in, I had to speak  
23 directly with Kern River and ask them some questions  
24 about which services they were able to provide and not.  
25 So they were well aware of our proposal. They're well

1 aware of our need. And yet they have not chosen to  
2 respond to any type of proposal. So I didn't feel it  
3 was upon me to create a proposal for them that they  
4 didn't even feel like they could provide.

5 **Q. Let's talk a little bit further about Kern**  
6 **River. Do you have an understanding of what the -- if**  
7 **there is such a thing as a Design Day on Kern River,**  
8 **when that might occur during the yearlong season?**

9 A. You know, again, I don't do the planning work  
10 for Kern River. I don't believe from a pipeline  
11 standpoint they have what's considered a Design Day.  
12 Their system is designed to meet their contractual  
13 requirements.

14 So they have contracts from each of their  
15 customers or their shippers and their pipeline is  
16 designed to meet all of those contracts. I don't think  
17 it's the same as our system where we have a Design Day  
18 which is weather dependent. Their design conditions are  
19 contract dependent.

20 **Q. All right. You indicated that there was**  
21 **long-term capacity available on Kern River, or did I**  
22 **misunderstand you?**

23 A. Well, the capacity on their pipeline the last  
24 time I checked was fully contracted and most of those  
25 were short-term contracts -- or some of those were

1 short-term contracts, which leads me to believe that  
2 they could have long-term capacity available if you were  
3 to contract long-term.

4 Q. Now, with respect to Kern River, there's two  
5 gate stations that have been identified and discussed,  
6 one Hunter Park and one a little further south than  
7 that. What are those gate stations?

8 A. Hunter Park and Riverton.

9 Q. With respect to Hunter Park, is that near the  
10 optimal -- the triangle of optimal deliveries into your  
11 system that you identified in your RFP?

12 A. Yes, it's somewhat close.

13 Q. Okay. And there's also been mention in some of  
14 the testimony that there is an additional new gate  
15 station that you're planning to access -- to put in  
16 place with Kern River. Where will that new city gate  
17 station be located?

18 A. That is going to be called the Rose Park gate  
19 station. I think Mike Platt would probably be able to  
20 talk more specifically about its location and any design  
21 criteria you would be interested in on that particular  
22 gate station.

23 Q. And would that gate station be one that would  
24 fall within that triangle of optimal delivery location  
25 that's identified in your RFP?

1           A. Again, I believe Mike Platt is probably the  
2 better person to speak to on that. I do know -- I  
3 believe that gate station will deliver into the 475  
4 pound -- or 471 pound system. But that's subject to  
5 check. And I think Mike Platt is probably the correct  
6 witness to testify on that.

7           **Q. Are you familiar with park and loan services**  
8 **that are provided by pipelines?**

9           A. Yes, I am.

10          **Q. Do you have any park and loan contracts with**  
11 **any of the pipelines that serve DEU?**

12          A. Right now I do not, but we have done a number  
13 of contracts. In fact, we did park on a contract with  
14 Dominion Energy Questar Pipeline recently in which we'll  
15 be getting that gas back sometime before the end of the  
16 year. So we are, I guess, involved in a contract right  
17 now for park and loan.

18          **Q. Isn't it true that pipelines can offer separate**  
19 **services called park and loan which allow for customers**  
20 **to bank some of their gas supplies that are delivered**  
21 **into that pipeline for deliveries that might occur in**  
22 **later years?**

23          A. Yes, that's usually a more seasonal type  
24 situation where you put gas into the storage in the  
25 summertime and pull it out in the winter. It's

1 generally how a park and loan would work.

2 Q. You would expect your Design Day to occur in  
3 the winter on the DEU system, right?

4 A. Yes.

5 Q. And isn't it true that when those park and loan  
6 situations are offered by pipelines, that they basically  
7 deliver that service as a result of a significant line  
8 pack that they have on their system as opposed to  
9 storage?

10 A. I believe most of the park and loans that we've  
11 been a part of have been due to storage. And I think  
12 it's also important to note that those park and loans  
13 often do not necessarily come with firm capacity to  
14 withdraw that. And even if they do come with firm  
15 withdrawal capacity, they do not have any associated  
16 pipeline capacity to deliver into the city gate.

17 And so, again, as I described before, even  
18 if you're able to get it out of the storage, unless you  
19 contract for the transportation capacity to go with it,  
20 you're not going to be able to get that gas when the  
21 system is -- when their system is constrained on what  
22 would be our peak dates.

23 So even if you can pull that park and loan  
24 out of the storage facility, you're not going to be able  
25 to deliver it without firm capacity.



1 Q. Are you aware that Kern River provides a park  
2 and loan service?

3 A. Yes, I am.

4 Q. And are you aware that DEQP also provides a  
5 park and loan system?

6 A. Obviously, yes, I am.

7 Q. And are you also aware that the Ruby Pipeline  
8 has such a park and loan service?

9 A. I am.

10 Q. Isn't it true that none of the studies or  
11 analyses developed by DEU in connection with this  
12 proceeding considered park and loan services as a  
13 potential alternative to serving the gas supply  
14 reliability issues that were identified by witness  
15 Faust?

16 A. Again, as I described earlier, we looked at all  
17 potential solutions a year ago when we looked at this  
18 docket. And we considered those. We also considered  
19 the fact that any of those park and loans still need  
20 delivery options. And we did our RFP and none of them  
21 proposed those park and loan solutions as a potential  
22 option for us.

23 If the pipeline itself considered that a  
24 viable solution, I would have assumed that the pipeline  
25 would then have proposed that as a solution to us. If

1 their goal is to sell those services, if they felt those  
2 services met our needs, they would have proposed them as  
3 a potential solution for us and responded to the bid.  
4 They did not.

5 **Q. And it might have been possible for someone to**  
6 **read and review your RFP and decide there was an**  
7 **invitation to get involved with the ownership and**  
8 **operation of an LNG facility in Magna, Utah if they were**  
9 **interested in that particular kind of business and, if**  
10 **not, bow out?**

11 A. I don't understand your question because the  
12 RFP was not --

13 **Q. I'll withdraw the question.**

14 A. -- to participate in --

15 **Q. I'll withdraw the question.**

16 A. What's that?

17 **Q. I'll withdraw the question.**

18 A. Okay. Thank you.

19 **Q. Isn't it true that you're planning to add a**  
20 **volume associated with the current Kern River peaking**  
21 **contract?**

22 A. Are you talking about the Kern River firm  
23 peaking service?

24 **Q. Yes.**

25 A. Are we considering adding a volume? We have to

1 reevaluate all of our firm peaking contracts, and we're  
2 going to do that after the order is issued in response  
3 to this, because we want to see how this may impact us.  
4 So, to say we have any specific plans on those, I think  
5 would be premature at this point.

6 **Q. Is there an obligation to raise the volumes on**  
7 **your current contract coincidental with the installment**  
8 **of that new Rose Park interconnection?**

9 A. The contract is what it is. It's not changing.  
10 The volume on the contract, if that's what you're  
11 referring to, does increase for this particular year,  
12 yes.

13 **Q. And you're comfortable that Kern River will be**  
14 **able to provide that additional volume level under the**  
15 **contract you have?**

16 A. I am. Again, it is a FERC approved rate. And  
17 they are contractually obligated to do so.

18 **Q. I have no other questions.**

19 COMMISSIONER LEVAR: Thank you. Mr.  
20 Russell?

21 MR. RUSSELL: Thank you, Mr. Chairman.

22 CROSS-EXAMINATION

23 BY MR. RUSSELL:

24 **Q. Mr. Schwarzenbach, my understanding is that if**  
25 **the commission were to approve the company's request to**

1 build an LNG plant, the company would then go out with  
2 another RFP for an EPC contract; is that right?

3 A. Yes.

4 Q. And would you be involved in that?

5 A. I'm not sure at this point if I would or would  
6 not. At that point, it's more of an engineering  
7 analysis. It's more of just a strictly engineering  
8 decision. So I think engineering would really be the  
9 one responsible for determining that.

10 Q. Okay. I asked the question because I'm a  
11 little curious what happens with the costs associated.  
12 You've got costs associated with the proposed LNG  
13 facility here. If there's a separate RFP, do the costs  
14 change? Or are you not the right person to talk to  
15 about that?

16 A. I'm not the right person to talk to about  
17 that.

18 Q. Okay. Fair enough. Do you know who would be?

19 A. I think it would probably be either Mr.  
20 Mendenhall or Mr. Gill.

21 Q. Okay. What involvement did you have in putting  
22 the RFP itself together here?

23 A. I worked as part of a team that developed the  
24 criteria and also evaluated the responses.

25 Q. The RFP is found in your Exhibit 3.02, right?

1 A. Yes.

2 Q. Okay. Can you turn to that?

3 A. Okay.

4 Q. Is it your contention that the RFP identifies  
5 the company supplier liability needs?

6 A. It states our design requirements for the  
7 potential resource that would meet those supplier  
8 reliability needs. I think the needs are outlined in  
9 general in here, and I think they're outlined even in  
10 more detail in Ms. Faust's testimony.

11 Q. Well, sure. But the bidders didn't have the  
12 benefit of Ms. Faust's testimony in this docket at the  
13 time they submitted the bids, right?

14 A. True. They -- the purpose of the RFP was to  
15 outline in general our needs and offer the design  
16 requirements to meet that need.

17 Q. Okay. And, in general, those needs are  
18 identified I guess on page 2, Section B, correct? Of  
19 the RFP? It may go past page 2. It's Section B,  
20 correct?

21 A. Section B. Those are the requirements for the  
22 resource, yes. We outlined the need and why we need  
23 such a facility on page 1 in the purpose and scope.

24 Q. Okay. Thank you. You have read, I imagine, or  
25 at least are aware of Mr. Platt's testimony in this

1 docket, correct?

2 A. Yes.

3 Q. Okay. And I have some questions for Mr. Platt.  
4 I won't ask you his questions. But my understanding is  
5 that Mr. Platt performed some modeling against each of  
6 the proposals with the RFP. Is that your understanding  
7 as well?

8 A. Yes, it is.

9 Q. Okay. And do you understand that in that  
10 modeling, the model was caused to assume a 150,000  
11 decatherm shortfall at each gate station?

12 A. Not all coincidentally.

13 Q. Right.

14 A. But, yes, separately.

15 Q. Not all at the same time?

16 A. Correct.

17 Q. It's a different issue. Is -- but when you say  
18 sequentially, one at a time?

19 A. Yes. Yes, individually.

20 Q. Right. I think we're saying the same thing,  
21 just in different ways.

22 Is -- were the bidders informed that that's  
23 how their projects would be evaluated? Is that anywhere  
24 in the RFP?

25 A. I don't know if it specifically states that in

1 the RFP or -- I don't think it does. I think what's  
2 stated in the RFP is the fact that there are -- we need  
3 a hundred and fifty thousand decatherms a day and that  
4 we state the delivery location, the optimal delivery  
5 location. And we do state that if it's delivered  
6 somewhere outside that optimal delivery location, that  
7 reinforcements may be required to make it apples to  
8 apples to what is in that delivery location.

9           And the purpose there and why it's stated  
10 that way is so that we can meet the same situations  
11 regardless of which location they happen in. We want to  
12 be able for this -- whatever resource it is must be able  
13 to meet all of the same needs. So we wanted to create  
14 an apples to apples assessment.

15           **Q. Thank you for that. I'm curious though how the**  
16 **bidders are supposed to know what the challenge is that**  
17 **they're supposed to meet if that challenge is presented**  
18 **sometime after the RFPs are submitted, meaning, if**  
19 **you're going to conduct an evaluation of each proposal**  
20 **after the bids are submitted, why not explain to the**  
21 **bidders beforehand that that's what you're going to**  
22 **do?**

23           **A. I think it is explained in the fact that -- of**  
24 **where they're required to deliver the supply. So that**  
25 **delivery location is the key to meeting all of those**

1 needs. If the supply is delivered in that location, it  
2 does meet all those needs. So I don't think we needed  
3 to identify every particular model that was going to be  
4 run to do that.

5 We've identified where the gas needed to be  
6 delivered. And that satisfies a number of different  
7 criterion just by being in that optimal delivery zone,  
8 which is where we needed it to be.

9 Q. Let's look at the -- I think it's the last  
10 sentence of Section 2 in that Part D of the RFP. And it  
11 states, "For proposals with delivery outside of these  
12 locations," -- and just for everybody's sake, these  
13 locations is the optimal delivery locations. "For  
14 proposals with delivery outside of these locations,  
15 additional costs for DEU system reinforcements may be  
16 needed to achieve equivalent distribution impact and  
17 will be considered in the overall proposal evaluation."

18 The question I'm trying to get at is, how  
19 is a bidder supposed to know whether additional  
20 reinforcements will be needed to achieve equivalent  
21 distribution system impact if they don't know what  
22 models you're going to throw in it afterwards?

23 A. I think the key is that it states that  
24 additional costs if you're outside that area are going  
25 to be needed for reinforcements. I mean, it does say



1 may be needed to achieve equivalent distribution. There  
2 is the possibility that somebody could have delivered it  
3 somewhere else and somehow it didn't need  
4 reinforcements. But the reality is it specifically  
5 outlines that if you're outside of that area, that  
6 system reinforcements are going to be needed.

7 **Q. And in your mind, what is meant by equivalent**  
8 **distribution system impact?**

9 A. That would be system pressures and the ability  
10 to make up for shortfalls regardless of where they  
11 occur.

12 **Q. Okay. Bear with me for just a second if you**  
13 **would.**

14 **Are you the witness that's best able to**  
15 **explain how we ended up with the criteria for a hundred**  
16 **fifty thousand decatherms?**

17 A. Probably not. I can speak to some part of  
18 that, though. And the part that I can speak to is the  
19 historical shortfalls that we have witnessed. We have  
20 seen -- I believe the highest was 139,000 decatherms of  
21 supply shortfall on one particular day.

22 So we did develop that somewhat based on  
23 that. And I believe Mr. Gill can talk to that more  
24 specifically in terms of what else went into that  
25 requirement. But from our standpoint, from a gas supply

1 standpoint, that hundred and fifty encompasses all the  
2 needs to kind of cover everything that we have seen.

3 **Q. In the hundred and thirty-nine thousand**  
4 **decatherm shortfall you just referenced, do you recall**  
5 **what event precipitated that or when it was?**

6 A. Subject to check, I believe that was the  
7 January 6th, 2017 event.

8 **Q. And do you know where that 139,000 decatherm**  
9 **shortfall was experienced on the system?**

10 A. I know it was subject to a number of different  
11 cuts in different locations on the system. So, it was  
12 spread out. However, an important note on that, maybe  
13 an asterisk on that hundred and thirty-nine thousand, is  
14 what doesn't show up in that number is the fact that  
15 that morning, we also received notice that there was a  
16 power failure at the Opal plant.

17 That would have led to -- or could have led  
18 to a supply shortfall of an even greater amount because  
19 we had a good deal of gas, over a hundred thousand  
20 decatherms of gas on Kern River from the Opal plant.

21 Had that -- had that event persisted, Kern  
22 River would have cut that gas. Fortunately for us, that  
23 day, Kern River did not cut the gas and therefore it did  
24 not show up in the hundred and thirty-nine thousand.

25 However, if that power outage would have

1 lasted a little bit longer, Kern's line pack was getting  
2 very low and they would not have been able to hold that  
3 -- keep everybody whole with that supply any longer than  
4 they did.

5                   So, had it gotten colder or had the power  
6 not come back on, is basically the key, they would have  
7 had to have done that cut. And if they did, we would  
8 have had easily over a hundred thousand cut that was  
9 coming from Opal directly to our Hunter Park station.

10                   So that was part of the fear on that day as  
11 well is that that power outage would persist. Kern  
12 River would make the cut. And the information we knew  
13 at the time in the morning was all signs were showing  
14 that that was going to happen and that Kern River was  
15 going to make the cut.

16                   Fortunately, the power came back on before  
17 the next cycle had to be confirmed and they were able to  
18 bring it back on. But, otherwise, we would have seen a  
19 point failure type situation of more than a hundred  
20 thousand decatherms at one particular gate station.

21           **Q. Okay. Thank you for that. Do you know what**  
22 **the largest shortfall in any single gate station was**  
23 **from that January 6, 2017 event?**

24           A. I do not know that offhand, no.

25           **Q. Okay. The question I had started with was**

1 where the hundred and fifty thousand decatherms comes  
2 from. There's a statement in several of the company's  
3 witness' testimonies that states that the vaporization  
4 capacity of the company proposed LNG facility was  
5 determined by the company's gas supply and system  
6 planning, the analysis department, as discussed in the  
7 pre file direct testimony of William S. Schwarzenbach.  
8 That I think comes from Mr. Gill's testimony. Did you  
9 just provide me what your --

10 A. Yes. So the basis there, again, was to cover  
11 the historic shortfalls that we had seen.

12 Q. Okay. And then the next sentence says  
13 something to the effect, the system planning analyzed  
14 how much gas could be taken into the company system.  
15 And is that somebody else's analysis or is that you?

16 A. That's my plan. So basically what it comes  
17 down to is you've got to -- we looked at what we could  
18 do historically. Then we did some system modeling,  
19 looked at how the system would handle gas coming into it  
20 at what -- you know, what was the most we could bring in  
21 at a single point or multiple points.

22 And then we also considered the  
23 engineering side of it to look at different types of  
24 facilities and what they could provide. So there was  
25 more than just one person who came up with that

1 number.

2 Q. Yes, there's -- I understand that there's more  
3 that goes into it. I'm just trying to figure out who  
4 did what. So that's very helpful. Thank you.

5 And I think that was all I have for you.  
6 Thank you.

7 COMMISSIONER LEVAR: Thank you. Any  
8 redirect?

9 MS. NELSON-CLARK: Yes. Just a few.

10 REDIRECT EXAMINATION

11 BY MS. NELSON-CLARK:

12 Q. Mr. Schwarzenbach, can I have you turn to your  
13 Exhibit 3.02? And that is a copy of the supply  
14 reliability resource request for proposal that Dominion  
15 Energy issued.

16 A. I have it it in front of me.

17 Q. Do you have it in front of you? Mr. Russell  
18 was questioning you about how a bidder might know that  
19 costs would be added in order to achieve the same system  
20 benefit. And I'm wondering if you can read for me  
21 footnote No. 2 on the bottom of page 2. I know that you  
22 pointed to paragraph D2 to say that some proposals may  
23 need additional reinforcements and accompanying costs.  
24 Can you read the footnote as well?

25 A. Yes. "DEU will consider options that provide

1 supply at a lower pressure; however, additional costs  
2 for DEU system reinforcements may be needed to achieve  
3 equivalent distribution system impact and will be  
4 considered in the overall proposal evaluation."

5 **Q. May I approach the witness?**

6 COMMISSIONER LEVAR: Yes.

7 **Q. Mr. Schwarzenbach, I'm going to provide to you**  
8 **what has been marked in this proceeding as Magnum**  
9 **Exhibit 1.3. It was attached to Mr. Lawton's testimony.**  
10 **I'm going to ask you if you recognize it and if you can**  
11 **tell me what it is.**

12 A. Yes, I do recognize it. It is questions that  
13 were sent to him by Magnum and responses provided by  
14 DEU.

15 **Q. And were those responses, questions and**  
16 **responses, made widely available to all bidders?**

17 A. Yes. Through the RFP process, we made sure  
18 that any questions that came in were answered and then  
19 provided on a website that everybody could review.

20 **Q. Okay. I'd like you to turn in that document to**  
21 **questions No. 8 and 11. And if you would, please, read**  
22 **the question and answer for each.**

23 A. Yes. Question No. 8, "If a project that is bid  
24 into this RFP response proposes delivery at Bluffdale,  
25 please explain what additional costs to facilities DEU

1 would consider or factor in to determine equivalent  
2 distribution system impacts."

3           The answer provided by DEU, "Depending on  
4 delivery location, pressure and volume, the company  
5 would have to upgrade or replace portions of its high  
6 pressure feeder line system to allow for delivery into  
7 the 471 pound psig and MAOP zone. This would include  
8 the construction of several high pressure regulator  
9 stations to separate this upgraded feeder line from the  
10 354 psig zone. The costs associated with these  
11 improvements would be included in DEU's analysis of the  
12 total cost of the option."

13           Question 11, "If an RFP response proposes  
14 delivery to Hunter Park, please explain what additional  
15 cost facilities DEU would consider or factor in to  
16 determine equivalent distribution system impacts."

17           The answer provided by DEU, "The company  
18 would have to upgrade or replace portions of its high  
19 pressure feeder line system to allow for delivery into  
20 the 471 psig and MAOP zone. This would include the  
21 construction of several high-pressure regulator stations  
22 to separate this upgraded feeder line from the 354 psig  
23 zone. The costs associated with these improvements  
24 would be included in DEU's analysis of the total cost of  
25 the option."

1 Q. And then finally, Mr. Schwarzenbach, I would  
2 like to turn your attention back to your Exhibit 3.02,  
3 the RFP, and ask you to review for us, read or  
4 summarize, whichever you're most comfortable with, the  
5 subparagraph E again -- or the paragraph in Section E  
6 Evaluation Criteria and Factors, and, for reference,  
7 it's on page 3 of the RFP.

8 A. Yes, I see it. I can read the whole thing.  
9 "Evaluation Criteria and Factors. DEU's evaluation  
10 process is intended to identify a supply reliability  
11 option that, taking into account all relevant factors,  
12 will allow DEU to provide safe, reliable, and cost-  
13 effective service to its customers, and maximize  
14 customer benefits. The criteria and factors that will  
15 be used to evaluate all proposals as well as a potential  
16 DEU owned on-system facility LNG facility will include  
17 the following price and non price factors:

18 "Whether the proposal will satisfy the  
19 operational or in-service" -- "...and in-service  
20 requirements set forth above.

21 "Total annual customer cost of the  
22 proposal.

23 "The long and short-term impacts of the  
24 proposal, including any operational considerations.

25 "Technical, operational and financial



1 viability of the proposal.

2 "The impact of the proposed delivery  
3 location on DEU's system, including any resulting costs  
4 or benefits.

5 "Reliability of the proposal, including but  
6 not limited to any operational reliability benefits and  
7 design redundancy.

8 "The risks addressed and/or presented by  
9 the proposal.

10 "The financial impact on DEU, if any, other  
11 than the costs included in subparagraph B above.

12 "Other benefits or risks associated with  
13 the proposal.

14 "Other factors that may be determined to be  
15 relevant."

16 **Q. I don't have any further questions.**

17 COMMISSIONER LEVAR: Thank you. Does the  
18 division have any questions about the redirect?

19 MR. JETTER: No questions. Thank you.

20 COMMISSIONER LEVAR: Mr. Snarr?

21 MR. SNARR: No questions.

22 COMMISSIONER LEVAR: Mr. Russell?

23 MR. RUSSELL: No questions.

24 COMMISSIONER LEVAR: I have maybe just one  
25 or two. You said you were involved with soliciting

1 input from the division of the office prior to issuance  
2 of the RFP?

3 A. I don't know how much I particularly was in  
4 that process but I know that, as a whole, we did send it  
5 to both the office and the division and ask for their  
6 input and their feedback and we incorporated that  
7 feedback.

8 COMMISSIONER LEVAR: Do you know who was  
9 more heavily involved in that?

10 A. I think Mr. Mendenhall was probably most  
11 involved in going back and forth with them.

12 COMMISSIONER LEVAR: Okay. Thank you. I  
13 don't have any other questions. Commissioner White?

14 COMMISSIONER WHITE: No questions. Thank  
15 you.

16 COMMISSIONER LEVAR: Commissioner Clark?

17 COMMISSIONER CLARK: You were here for the  
18 conversation with Mr. Mendenhall about option -- Magnum  
19 Option 1B this morning, correct?

20 A. Yes, I was.

21 COMMISSIONER CLARK: And when we're talking  
22 about reinforcements here -- and by here, I mean the RFP  
23 document 3.02 is the exhibit number, page 2 -- this is  
24 the page I'm on when I refer to reinforcements. Are  
25 these the kinds of reinforcements that Mr. Mendenhall

1 was mentioning and as he discussed his assumption about  
2 what costs Magnum was willing to bear, or is it a  
3 different type of --

4 A. No, these were the type of reinforcements we  
5 were talking about. And I actually believe that the  
6 footnote involved in their response makes it quite clear  
7 that they knew which reinforcements we were talking  
8 about as well and that they provided the costs that they  
9 were willing to pay for those reinforcements.

10 If they considered that to be open-ended  
11 where they were just going to pay whatever those costs  
12 were, I think they would have either stated that, A; or,  
13 B, not made a particular -- I mean they had two  
14 different -- 1A and 1B which specifically called out in  
15 1B that they were going to pay for a certain number of  
16 -- or cost number for reinforcements.

17 You don't do that and provide that specific  
18 number if you're going to just have it open-ended and  
19 say, we're going to pay for whatever the reinforcements  
20 are.

21 COMMISSIONER CLARK: When they provided  
22 option one, the -- or, yeah, that optional proposal,  
23 would they have been aware at that time of DEU's view of  
24 what the total reenforcement costs would be for that  
25 particular proposal or would they have become aware of

1 that after? And if after, when and how would they have  
2 become aware?

3 A. I'm not sure on when they became aware. But I  
4 believe they became fully aware of our costs after they  
5 submitted that.

6 COMMISSIONER CLARK: Do you know about when  
7 that would have been?

8 A. I do not. I think Mr. Gill probably could  
9 speak to that.

10 COMMISSIONER CLARK: Thank you.

11 COMMISSIONER LEVAR: Thank you, Mr.  
12 Platt -- I'm sorry, Mr. Schwarzenbach, before your  
13 testimony, could I ask for one or two follow-up  
14 questions to Mr. Mendenhall?

15 MR. MENDENHALL: Sure.

16 COMMISSIONER LEVAR: And these will be  
17 brief. And you can just stay at the table. And you're  
18 still sworn in.

19 And I'll preface this with, I don't want  
20 you to give any answers that talk about what feedback  
21 you received from the division or the office --

22 MR. MENDENHALL: Right.

23 COMMISSIONER LEVAR: -- but if you were  
24 involved in soliciting feedback from them, what did that  
25 entail?

1 MR. MENDENHALL: Yes, so -- I'm going off  
2 my memory so I'll tell you what I know for sure and  
3 then what I'm a little fuzzy on. So, we developed the  
4 RFP and then we sent it to both the office and division.  
5 And I know we had at least one meeting -- we might have  
6 had a couple but I know one for sure -- where we  
7 basically sat down and read through the RFP and they  
8 discussed potential changes or concerns that they had.

9 And then we went back. We incorporated a  
10 lot of that feedback, sent out another version. And  
11 then I know there were a couple back and forths via  
12 email, you know, some fine tuning. I know the division  
13 sent it to Mr. Neale for review and he had some feedback  
14 and we incorporated some of that feedback.

15 And then we at that point sent out kind of  
16 what we believed to be the final version and let them  
17 know, this is what we were planning on rolling with. I  
18 believe it was the beginning of January. And so that  
19 was kind of how the process happened.

20 COMMISSIONER LEVAR: Okay. Thank you. And  
21 then just one follow-up question. And, again, I'll give  
22 the same clarification. I don't want you to say what  
23 the feedback was but did these drafts that were being  
24 discussed contain the delivery location that was in the  
25 final RFP?

1 MR. MENDENHALL: Yes, I believe it did,  
2 yes.

3 COMMISSIONER LEVAR: Thank you for letting  
4 me do that follow-up. Commissioners Clark or White, any  
5 other follow-up?

6 COMMISSIONER CLARK: No.

7 COMMISSIONER WHITE: No.

8 COMMISSIONER LEVAR: Thank you.

9 MR. SABIN: Mr. Chairman, we have just one  
10 issue to raise. One of the experts needs to travel, I  
11 think, home today. Is that right? Ms. Beck talked to  
12 us yesterday and said --

13 UNIDENTIFIED: I think it's tomorrow.

14 MR. SABIN: Is it tomorrow? Okay.

15 MR. SNARR: Early tomorrow will work.

16 MR. SABIN: We just wanted to make sure the  
17 witness was able to catch whatever travel  
18 arrangements...

19 COMMISSIONER LEVAR: Okay. But we're okay  
20 continuing --

21 MR. SABIN: Yes.

22 COMMISSIONER LEVAR: Why don't we take a  
23 break at this point. Why don't we take about ten  
24 minutes and then reconvene.

25 (A ten minute recess was commenced.)

1                   COMMISSIONER LEVAR:   Okay, we're back on  
2 the record.   And we'll go to Dominion Energy Utah's next  
3 witness.

4                   MR. SABIN:   Dominion Energy Utah calls Mike  
5 Platt.

6                   COMMISSIONER LEVAR:   Mr. Platt, do you  
7 swear to tell truth?

8                   MR. PLATT:   I do.

9                   COMMISSIONER LEVAR:   Thank you.

10                   MICHAEL L. PLATT,  
11 called as a witness, having been first duly sworn, was  
12 examined and testified as follows:

13                   DIRECT EXAMINATION

14 BY MR. SABIN:

15           **Q. Mr. Platt, could you state your full name for**  
16 **the record, please?**

17           A. Michael Loren Platt.

18           **Q. I don't think it's picking you up there.**

19           A. Michael Loren Platt.

20           **Q. There we go. Would you please state what your**  
21 **position is with the company?**

22           A. I am the manager of the engineering systems.

23           **Q. And in that capacity, what is your**  
24 **responsibility?**

25           A. My responsibility is to plan the system from an

1 engineering and systems standpoint. I also manage the  
2 research and development group, the records --  
3 engineering records management group and the GIS group.

4 Q. Thank you. In this proceeding you filed both  
5 direct rebuttal and surrebuttal testimony, correct?

6 A. Correct.

7 Q. And I have those as Exhibits 4.0 with -- well,  
8 Exhibit 4.0 through 4.01 and -- let me try this again.  
9 Your direct testimony is Exhibit 4.0, is that correct?

10 A. Correct.

11 Q. And attached to that testimony are Exhibits  
12 4.01 through 4.04, correct?

13 A. Correct.

14 Q. And then I have for your rebuttal testimony  
15 Exhibit 4.0R, correct?

16 A. Correct.

17 Q. And as an attached exhibit to that document,  
18 which is -- excuse me. And then you have 4.0SR is your  
19 surrebuttal testimony, correct?

20 A. Correct.

21 Q. Do you have any changes to any of that  
22 testimony?

23 A. I do not.

24 Q. Do you adopt that testimony today as if you  
25 were giving it here today?



1 A. I do.

2 Q. Have you prepared a summary for the commission  
3 of your direct rebuttal and surrebuttal testimonies?

4 A. I have.

5 Q. Will you please provide that now?

6 A. Yes. Thank you. The purpose of my testimony  
7 is to establish the risk of shortfalls to ensure the  
8 options considered meet the customer's needs and to  
9 communicate how the proposed LNG facility performs from  
10 a gas network analysis standpoint.

11 I've conducted significant analysis  
12 concerning the consequence and probability, in other  
13 words, the risk, of shortfalls. If the company has a  
14 shortfall on a cold enough date, it will lose service to  
15 customers without a supply reliability resource.

16 If a shortfall of a hundred and fifty  
17 thousand decatherms occurs on a Design Day or colder,  
18 650,000 customers, or as many as 650,000 customers, will  
19 lose service. In this scenario, Kem C. Gardner  
20 Institute determined an economic impact to gross state  
21 product of \$2.4 billion dollars.

22 Costs of such an event extends beyond gross  
23 state product to include health impact, safety risk,  
24 property damage, and potential customer product damage.  
25 Without a supplier reliability resource, shortfalls at

1 that temperatures less than or equal to three degrees  
2 mean cannot be replaced and may result in a loss of  
3 service. Cold temperatures and the pressure of liquids  
4 in the gas stream result in freeze-offs and supply  
5 shortfalls that predictably occur under certain  
6 circumstances.

7 Other risks that potentially result in  
8 shortfalls include but are not limited to landslides,  
9 flooding, earthquakes, human error, upstream facility  
10 design inadequacies and maintenance, cyber attacks and  
11 third-party damage.

12 The risk of the shortfall scenario I  
13 mentioned earlier caused by a freeze-off on a Design Day  
14 is approximately equal to \$125 million of annual risk in  
15 known costs alone, which is much higher than the risk of  
16 an earthquake occurring at extremely cold temperatures.  
17 This amount is also much higher than the cost of any of  
18 the options.

19 The annual risk increases to \$141,500,000  
20 if the calculation includes the entire temperature range  
21 of three degrees mean and colder. Potential shortfalls  
22 due to causes other than temperature only increase the  
23 total amount of risk of lacking a supply reliability  
24 resource.

25 Therefore, continuing to analyze every

1 potential scenario will not yield additional benefit and  
2 is not reasonable. In order to ensure that options met  
3 the customers' needs, I modeled all proposals in a  
4 projected 2023 Design Day model with supply shortfalls  
5 at each gate station feeding the Wasatch Front.

6           Proposals that deliver outside the optimal  
7 delivery location are not capable of mitigating  
8 shortfalls at each gate station without reinforcements.  
9 No other witness disputes this fact.

10           Reinforcements added to base proposals only  
11 include additions that are required to meet customers'  
12 needs. The optimal delivery location was identified due  
13 to the fact that it is the only area that a supplier  
14 reliability resource can be located that would mitigate  
15 shortfall scenarios at every gate station feeding the  
16 Wasatch Front.

17           Through the same system analysis performed  
18 on all options, I determined that the company owned  
19 on-system storage in the form of an LNG facility will  
20 prevent loss of service in shortfall scenarios up to a  
21 hundred fifty thousand decatherms a day, including on a  
22 peak day.

23           A DEU owned LNG facility could provide an  
24 additional 25,000 decatherms of peak hour service, and  
25 the proposed LNG facility will completely mitigate many

1 scenarios and partially mitigate more impactful  
2 scenarios, however, the LNG facility is not nor should  
3 be sized to eliminate all risk from shortfall scenarios,  
4 only those that are most probable. This concludes my  
5 summary.

6 Q. (By Mr. Sabin) Thank you, Mr. Platt. There  
7 have been a number of questions today about what  
8 probabilities the company has analyzed and what  
9 probabilities the company has not calculated in a  
10 mathematical way. Could you summarize for the  
11 commission what probability analysis you did conduct?

12 A. So, if you refer back to the supply liability  
13 risk document that is attached to Tina Faust's  
14 testimony, it talks about the temperatures at which we  
15 no longer have supply resources to call upon. And that  
16 is at three degrees mean and colder, which has a  
17 probability of occurring once every 16 years.

18 Now there's some question of whether or not  
19 there will be freeze-offs at these temperatures. And I  
20 find it interesting because if we were talking about  
21 water in a glass freezing, it is certain. There are  
22 temperatures and conditions that will result in  
23 freeze-offs. There are liquids in our gas stream in the  
24 wells that we rely on. And those occur predictably at  
25 cold temperatures because they are following the same

1 time phenomenon as a glass of water freezing.

2 We had a technical conference. And it was  
3 presented that hydrates form at certain temperatures and  
4 certain liquid contents. And a chart was shown. It is  
5 predictable. We have a history of that.

6 There is a probability that an earthquake  
7 will occur. And from the AGRC website, they have posted  
8 on their website that a 6.5 magnitude earthquake or  
9 greater will occur once every 200 years. I included  
10 that in my rebuttal testimony and I used that to  
11 calculate a risk of known proportion.

12 So, the fact that some people have brought  
13 up the lack of a probabilistic analysis, I disagree  
14 with. It's in my written testimony.

15 As for why we didn't continue to calculate  
16 the probability of things like third-party dig-ins on  
17 our high pressure lines, well, we have dig-ins and  
18 third-party damage every single day.

19 Now, the consequence of those dig-ins  
20 depends greatly upon where it is located, which is much  
21 harder to predict. So, determining a meaningful  
22 consequence for that scenario doesn't -- it doesn't  
23 change the outcome that the risks that we know are  
24 enough to justify investing in this resource.

25 **Q. So, Mr. Snarr was asking Ms. Faust about why**

1 you did or didn't run statistical analyses or  
2 probability analyses on things like plant shutdowns.  
3 How would you respond to Mr. Snarr's questioning on that  
4 front?

5 A. As far as power outages?

6 Q. Yes. Why didn't you need to run statistical  
7 analyses or -- why not do that?

8 A. They are such improbable events. They can be  
9 high consequence, but almost impossible given the  
10 dataset to determine what the probability of those shut-  
11 downs would be.

12 Q. And why would that be? What do you mean when  
13 you say that the dataset -- these are my words -- don't  
14 yield the information that would help you run a  
15 probability analysis?

16 A. Well I'm not aware of any public data where all  
17 plant shutdowns are located that one could go in and  
18 determine based on that and the frequency what the  
19 probability would be.

20 Q. Okay. So, is it fair to say that for the  
21 issues or the concerns the company has raised in its  
22 risk analysis where you did have dataset or the ability  
23 to run probability analysis, that you did that?

24 A. Yes. That is fair to say.

25 Q. Okay. You just mentioned -- just a couple more

1 things. You just mentioned in your statement, your  
2 summary -- again, these are my words, not yours -- that  
3 the annual risk you calculated from using these  
4 probability analyses exceeds the cost of all of the  
5 supply reliability options. Would you explain what you  
6 mean by that?

7 A. What I mean by that is if you take the  
8 consequence of \$2.4 billion to gross state product, plus  
9 an additional perhaps a hundred million for us to  
10 relight those customers over 51 days, that cost  
11 multiplied by the annual probability, once in 20 years  
12 or five percent, results in a hundred and twenty-five  
13 million.

14 Q. On an annual basis?

15 A. On an annual basis. So if you continue down  
16 that line, the probability of temperatures between  
17 negative five degrees mean -- and I can't remember where  
18 I broke it off -- negative two, and multiply that by the  
19 probable consequence of that scenario and continue down  
20 until you get to three degrees mean, you sum that up and  
21 that's \$141,500,000 dollars of annual risk.

22 Q. Just one more question. Some of the questions  
23 that have been asked today that I think probably you're  
24 going to get here in just a minute, in the community, we  
25 plan for safety or emergency problems that might come

1 up. That happens at the government level. It happens  
2 at city levels. It happens in utilities. Have you  
3 participated in any groups or organizations that have  
4 discussed this very kind of planning that you do?

5 A. Actually, I have. Just about every year, I  
6 meet for the Great Shakeout of Utah. This summer I met  
7 with FEMA and the State of Utah and we discussed how  
8 energy companies might respond to a 7.0 magnitude  
9 earthquake.

10 Q. Okay, thank you. Mr. Platt is now available  
11 for cross-examination.

12 COMMISSIONER LEVAR: I don't think we got  
13 his testimony entered.

14 MR. SABIN: Oh, excuse me. You're right.  
15 Let's do that right now. Thank you. DEU moves to admit  
16 Exhibits 4.0, 4.01 through 4.04, 4.0R and 4.0SR into the  
17 record.

18 COMMISSIONER LEVAR: If there's any  
19 objection to the motion, indicate to me. I'm not seeing  
20 any objection so the motion is granted.

21 MR. SABIN: Thank you.

22 COMMISSIONER LEVAR: Mr. Jetter or  
23 Ms. Schmid?

24 CROSS-EXAMINATION

25 BY MR. JETTER:



1 Q. Good afternoon.

2 A. Good afternoon.

3 Q. I'd like to I guess discuss your risk  
4 calculation a little bit. And the first thing I'd like  
5 to ask you about is you've referenced a study that was  
6 done on the cost of a potential service outage. Did  
7 that study include the cost of outage to transportation  
8 customers?

9 A. That was the cost to everyone in the State of  
10 Utah, everybody in our service territory.

11 Q. Okay. And that assumes that the loss would  
12 apply equally to transportation customers? Do you know  
13 if that's the case?

14 A. I think that we could review that study. It's  
15 attached to my testimony. I'm not sure that -- I think  
16 that what you're getting at is a cost of impact of  
17 failure. And that would be the damage done by not  
18 having supply reliability. And that would affect  
19 everyone in the state, everybody that's served by  
20 Dominion Energy Utah.

21 Q. And that would also affect the transportation  
22 service customers?

23 A. If there's somebody, then everybody I think  
24 includes that, yes.

25 Q. And so wouldn't it be reasonable to apportion a

1 portion of the cost of a service failure to those  
2 customers, those transportation customers who are not  
3 apparently participating in the facility?

4 A. I don't necessarily agree with that, but just  
5 let me tell you that who pays for it is not the focus of  
6 my testimony. It's not the focus of my analysis. It's  
7 not something that -- if transportation customers pay  
8 for it or not, it does not affect the results or the  
9 opinions that are included in my testimony.

10 Q. But you didn't plan for this facility for the  
11 transportation customer --

12 A. This facility has not been planned to replace  
13 any transportation customers' demand.

14 Q. Even though they might contribute to the outage  
15 that might result?

16 (Witness nods head.)

17 Q. I'd like to direct you now to lines 16  
18 through -- well, start at line 17 of your rebuttal  
19 testimony.

20 A. Sorry, I have to search through the rain forest  
21 of trees that... Line 17, you said?

22 Q. Yes, that is correct. And what I'm looking at  
23 here -- and you tell me if I read this correctly. You  
24 say that the probability of such an event occurring on a  
25 Design Day is five percent annually. Such an event,

1 **what did you mean by such an event?**

2 A. Well, I think that the question is that -- has  
3 Dominion Energy performed an appropriate risk analysis?  
4 And I think that such an event at peak day occurs five  
5 percent annually. And on a peak day, temperatures will  
6 be cold enough for freeze-offs to occur.

7 Q. And are you confident that there's a hundred  
8 percent correlation between a peak day and an event -- a  
9 consistency of a hundred percent -- consistency between  
10 peak day and freeze-offs of such a level that they  
11 couldn't be covered by available market purchases?

12 A. I am confident that freeze-offs are temperature  
13 dependent and the freeze-offs that we have experienced  
14 at warmer temperatures are around 150,000. So it would  
15 be at least 150,000, yes.

16 Q. So when I look at the data that you've  
17 provided, and you're probably familiar with all of the  
18 outages from 2011 through 2019, would you accept,  
19 subject to check, that the hundred and thirty-nine  
20 thousand decatherm outage, for example, on December  
21 30th, 2014 occurred on a day when the mean temperature  
22 was 23 degrees?

23 A. I would agree that the mean temperature of that  
24 day in the Salt Lake valley, subject to check, was maybe  
25 23. But I would also submit to you that if you review

1 the history and the temperatures the day prior and the  
2 day prior to that and the morning temperatures when that  
3 shortfall occurred, that you might find something  
4 different in Wyoming.

5 Q. And -- well, as I look at this, the day after  
6 that was actually quite a bit colder. It was 12  
7 degrees, which is equal to the coldest day in the  
8 dataset provided. And on that day, there was only a  
9 cut of 24,000 decatherms. Is that consistent with a  
10 hundred percent correlation between temperature and  
11 freeze-off?

12 A. Well, there's a hundred percent correlation but  
13 there's also mitigation measures. So if they've  
14 experienced freeze-offs, then many producers' wells will  
15 be implementing mitigation as high as possible because  
16 they want to sell their product.

17 Q. And would you expect that in the normal course  
18 of business on a Design Day also?

19 A. I would expect that in the normal course of  
20 business on any day. If freeze-offs occurred prior,  
21 they should have all of their mitigation in effect. But  
22 if we've already experienced a loss of service, what  
23 does it matter?

24 Q. Well, in the history of the company, have you  
25 ever experienced a loss of service in the Salt Lake

**1 valley as a result of a freeze-off?**

2 A. In the history of the company, in recent  
3 history, we have not. And we have not also experienced  
4 temperatures of three degrees mean or colder in recent  
5 history.

**6 Q. Okay. And it certainly hasn't happened in the  
7 last 30 years; is that correct?**

8 A. I think that if we go -- the further we go  
9 back, the more tools gas supply had to utilize. And  
10 there is an event in Ms. Faust's testimony where many  
11 things that we could not do, could not call upon today,  
12 would have resulted in a loss of service to customers.

13 So I don't think that that's a fair  
14 representation of the company's history or the tools  
15 that we've had to use.

**16 Q. But you would say that you've never  
17 experienced -- well, let me ask you this: Has the  
18 company in any of the data provided in any of your test  
19 data from the company suggested that the company has  
20 ever experienced a Design Day?**

21 A. In the data that we provided in any hearing,  
22 yes, we have experienced Design Days.

**23 Q. Okay. And you didn't lose service?**

24 A. I don't know if you realize this, but I wasn't  
25 around for all of those Design Days.

1           **Q. But wouldn't that suggest then that an**  
2 **occurrence of a Design Day is not consistent every time**  
3 **with an occurrence of an outage for customers?**

4           A. I don't think that you're understanding where  
5 I'm going with the tools that we use to have. There  
6 used to be a great amount of flexibility and cooperation  
7 between upstream pipelines and distribution companies  
8 that's no longer there. So, I just don't think that  
9 that's a fair representation.

10           **Q. But it is a fair representation, isn't it, that**  
11 **you've managed every outage that has occurred in the**  
12 **last 30 years?**

13           A. In recent history, yes.

14           **Q. But your testimony assumes that that won't be**  
15 **the case on a Design Day?**

16                                   (Witness nods head.)

17           **Q. So you're confident this winter, if we have a**  
18 **Design Day, that the system will lose 650,000 customers?**

19           A. If we have a Design Day this winter without a  
20 supply reliability resource, I'm going to be sad. I'm  
21 going to be very sad. And I will expect to lose service  
22 to a certain number of customers despite measures that  
23 are taken.

24           **Q. And do you know what available short-term gas**  
25 **supplies will be on the pipelines at that time or**

1 available to be --

2 A. I don't work in gas supply so this isn't really  
3 a fair question. But I know that if we have a  
4 shortfall, we have to work within the native cycle to  
5 replace that gas supply. So if it's available or not --

6 Q. Isn't it your testimony that that gas supply  
7 will not be available?

8 A. Well, if we want to talk about transportation  
9 capacity and what -- let's talk about something that I  
10 can speak to. On a peak day --

11 Q. I want you to answer my question.

12 A. I'm answering your question. On a peak day,  
13 our transportation capacity will be completely full. We  
14 will -- the upstream pipelines that we depend on, if  
15 they have a shortfall, there's going to be no place  
16 where we can replace that. So, no, it won't be  
17 available. And if it's available, there won't be  
18 transportation available.

19 Q. And so you've had available capacity; is that  
20 correct?

21 A. Warmer temperatures.

22 Q. But you're confident that it won't be  
23 available.

24 A. I'm confident.

25 Q. And how do you -- what is your basis for that?

1           A. Because I know what the gate stations that we  
2 have on our system will be flowing through the joint  
3 operations agreement analysis that we perform annually.  
4 I know what's available to our system and our  
5 customers.

6           **Q. And so --**

7                   MR. SABIN: I'm sorry, could you move that  
8 microphone a little closer to you? I think we're losing  
9 your end. Sorry.

10          A. No, I'm sorry. Thank you.

11          **Q. And so you're testifying that if you have a**  
12 **shortage of supply from one of your sources, that the**  
13 **transmission capacity that otherwise would be used for**  
14 **that particular gas supply that you're now short will**  
15 **not be available?**

16          A. I don't think it will.

17          **Q. And you're not putting the gas on the line that**  
18 **otherwise would have been there; is that correct?**

19          A. I'm sorry, I don't understand how you can put  
20 gas on a line when there's a shortfall. I think you  
21 missed your opportunity with the gas supply folks,  
22 because I'm very confident in what happens to the gas  
23 once it comes into our gate stations, but what happens  
24 upstream, that's a different story.

25                   I know that on a Design Day, our gate



1 stations are flowing at full capacity.

2 Q. And I think your testimony is that a shortfall  
3 in supply, not a transmission, will occur on a Design  
4 Day?

5 (Witness nods head.)

6 Q. But you don't know if that supply could be  
7 replaced?

8 A. I'm telling you that a better person to ask  
9 would be either Schwarzenbach or Faust.

10 Q. Let me ask you a hypothetical. If that supply  
11 could be replaced at the same level as the freeze-off  
12 that occurred on a cold day, would you then expect that  
13 the DEU could retain service to all customers?

14 A. So in that -- the hypothetical scenario where a  
15 supply freeze-off occurs and is immediately,  
16 instantaneously replaced at the same point to the same  
17 delivery, will things continue to run? Yes. Is that  
18 realistic? No. Because there's no gas supply that  
19 responds that quickly from the same point.

20 Q. Is it accurate that a nomination in delivery at  
21 the next cycle would retain sufficient pressure on the  
22 interstate pipelines to deliver --

23 A. So, I need a NAESB chart in front of me, and I  
24 know one has been presented more than once. But so what  
25 you're telling me is, or what you're asking me is if at

1 eight a.m., there's a shortfall that is then replaced at  
2 one p.m., will the pressures on the transmission  
3 pipeline change between those two times? I don't know.  
4 I can tell you that if we have a shortfall and we do not  
5 have gas flowing at eight a.m., we would lose service to  
6 customers within minutes, less than an hour.

7 The reason why 30 minutes is in the RFP is  
8 because we'll need it as fast as possible. So whatever  
9 happens on the transportation pipeline is irrelevant.

10 **Q. Isn't the pressure at the gate station**  
11 **relevant?**

12 A. The pressure at the gate station is relevant  
13 but also the volume coming through the gate is relevant.  
14 And there's pressure upstream and pressure downstream.  
15 So if you don't have gas flowing through the gate, your  
16 pressure downstream is going to rapidly decrease.

17 **Q. And so -- I think it was discussed earlier a**  
18 **little bit -- but a notification from Opal that your**  
19 **delivery was not available at eight but was replaced in**  
20 **the next cycle, would you expect that to cause customer**  
21 **outage?**

22 A. Yes.

23 **Q. In between those two periods?**

24 A. I would expect that.

25 **Q. Okay. And you would allow a transportation**

1 customer to do that if --

2 A. To continue flowing if they were on a hold to  
3 schedule burn between eight and one? No, I don't think  
4 that we would do that. But, again, I don't work in gas  
5 supply so you would have to ask Mr. Schwarzenbach about  
6 what he would do exactly. But, from the way I  
7 understand it, if gas supply is not showing up, then  
8 they are to curtail.

9 Q. Okay. Let me ask you another hypothetical  
10 question here. If freeze-offs are not directly one to  
11 one correlated with Design Days, then the calculation of  
12 the risk would change, would it not? That would be a  
13 compound --

14 A. If water doesn't freeze at 32 degrees, then you  
15 won't have an ice cube. I think that we can talk about  
16 hypotheticals where the laws of physics don't apply but  
17 it would be meaningless to speculate.

18 Q. Are you a gas well expert?

19 A. Am I a gas well expert?

20 Q. Yes.

21 A. I am an engineer.

22 Q. Are you familiar with mitigation efforts for  
23 freeze-offs?

24 A. I'm familiar enough to know that they occur.

25 Q. Okay. And if hypothetically it were the case

1 that, for example, Texas gas wells at the same  
2 temperatures would experience significantly greater  
3 freeze-offs, such as the one that happened in the  
4 southwest leading to those outages, as compared to the  
5 pocket fields, which are much colder, would that  
6 surprise you?

7 A. No. I think that it's all data dependent,  
8 right? It would be dependent on how much fluid liquid  
9 is in their gas stream. I mean there are a number of  
10 factors.

11 Q. So maybe 31 degrees at one wellhead has a  
12 different effect than 31 degrees at another wellhead?

13 A. That's a fact.

14 Q. And is it also a fact that there are mitigation  
15 options at wellheads such as injecting, I believe it's  
16 alcohol, into the system to prevent freeze-offs?

17 A. There are mitigation efforts that producers can  
18 choose to do.

19 Q. And so wouldn't that suggest that the cold  
20 temperature is not always related to the same effect at  
21 every well?

22 A. It depends on the producer, right? So if  
23 historically we've experienced freeze-offs to a certain  
24 extent, then we know that, to a certain extent, those  
25 producers aren't taking mitigative actions until they

1 experience freeze-offs.

2 **Q. And is it possible that they do remedial**  
3 **efforts after those freeze-offs?**

4 A. The remedial efforts, as I understand it, is to  
5 depressurize the wellhead, which takes time.

6 **Q. And could they change the wellheads and add**  
7 **insulation, heating coils, those types of things?**

8 A. They can do any number of things but it's not  
9 in my control nor the company's control to force them to  
10 do those things.

11 **Q. But you're still confident that a hundred**  
12 **percent of the time, a Design Day will result in a**  
13 **shortfall?**

14 A. I am confident of that based on our gas supply  
15 and our history.

16 **Q. Okay, let me ask you some questions about your**  
17 **interaction with some of the bidders. Did you**  
18 **participate in the calculation of the reinforcement**  
19 **costs?**

20 A. I did not participate in the calculation of the  
21 costs, no, I did not. I did run the analysis on the  
22 system to determine what reinforcements were required.

23 **Q. And when did you do that relative to the**  
24 **bidding process?**

25 A. Well, it's hard to determine what

1 reinforcements are required until you know what the  
2 options are. So, after the proposals were in.

3 **Q. Okay. And so for the bidders, they would have**  
4 **had to basically take a guess at what those costs would**  
5 **be?**

6 A. I don't think that the company requested the  
7 bidders to take a guess. I think that the company  
8 stated that options that didn't provide the same results  
9 or were not located in the optimal delivery location may  
10 have costs added.

11 **Q. And how would a bidder know whether it was in**  
12 **their best interest to interconnect somewhere else or**  
13 **build out some type of an interconnection to the --**

14 A. So let me understand the question properly. If  
15 I'm a bidder and I'm responding to an RFP that  
16 identifies a location and states that costs may be added  
17 if you're not in this location, how would I know that  
18 that location would be the location that I should  
19 deliver into?

20 **Q. How would you know what the cost would be from**  
21 **an alternative location if that was also allowed in the**  
22 **bid?**

23 A. Since I have never bid on an RFP, I wouldn't  
24 know how to know that.

25 **Q. And there wouldn't be any way for the bidders**

1 to know that either, would there?

2 A. I have no idea. Now, I can tell you that if I  
3 had a proposal, which this is another hypothetical -- I  
4 know you like hypotheticals -- if I were a bidder and I  
5 were given a location, I would do the engineering and  
6 estimate how much it would cost to get to that location  
7 and determine for myself what I think it would cost and  
8 whether or not I as a bidder should build that or leave  
9 it up to someone else.

10 Q. Do you know if the company made that available  
11 to any of the bidders, the design criteria for the  
12 reinforcements, so that they could get an estimate of  
13 those costs?

14 A. I'm sorry, I don't understand the question.

15 Q. You did -- I guess your testimony was that you  
16 didn't provide the bidders with any design for the  
17 reinforcements that would be necessary prior to the bids  
18 being finalized.

19 A. I think if you want to talk about design  
20 engineering, you need to direct your question to  
21 Mr. Gill.

22 Q. Okay. I don't think I have any further  
23 questions. Thank you.

24 COMMISSIONER LEVAR: Thank you. Mr. Snarr?

25 MR. SNARR: Yes. Thank you.

1

CROSS-EXAMINATION

2 BY MR. SNARR:

3 Q. Mr. Platt, just a few questions related to  
4 risk. You indicate on lines 16 and 17 that risk by  
5 definition is the probability of occurrence multiplied  
6 by the consequence of that occurrence. Have I quoted  
7 you correctly?

8 A. You have.

9 Q. Thank you. At lines 22 and 23 of your  
10 testimony, you indicate that your risk assessments were  
11 focused on peak day design scenarios; is that correct?

12 A. Let me flip to where you're at.

13 Q. Sure.

14 A. This is in my rebuttal testimony?

15 Q. Yes, in your rebuttal testimony. And I  
16 reference lines 22 and 23.

17 A. That is correct.

18 Q. Thank you. Now, I recognize that your tenure  
19 with Dominion may be more short-term in terms of the  
20 tenure you have compared to others who have come in.  
21 I'm going to ask a question that might go beyond your  
22 history anyway.

23 What is -- to your knowledge or  
24 information, what has been the company's history in  
25 actually experiencing a peak Design Day condition?



1           A. Well, I think that the probability is more  
2 relevant than the actual occurrences.

3           **Q. Okay. Well I'm asking about the history just**  
4 **to build into the probabilities.**

5           A. Well, as you said, my tenure doesn't extend  
6 back to 1929, so I don't recall all of the times that  
7 we've had a peak day.

8           **Q. And yet you come up with an assessment of a**  
9 **five percent annual chance of a peak Design Day**  
10 **occurring; is that right?**

11          A. The probability of a Design Day is five  
12 percent.

13          **Q. And what information did you use to establish**  
14 **that five percent in your mind of setting up a**  
15 **probability?**

16          A. Historical temperatures. And, actually, if you  
17 want to get into it, the regulatory department  
18 determines that probability and the temperature.

19          **Q. So, it's based on temperature and other**  
20 **conditions, is it not?**

21          A. It is based on temperature and other  
22 conditions.

23          **Q. All right. And yet there's another place in**  
24 **your testimony -- I believe it's on page 4 -- you talk**  
25 **about the probability of events occurring not at Design**

1 Day conditions but at the three percent degree or lower;  
2 is that correct?

3 A. Three degrees Fahrenheit, you mean? Or lower?

4 Q. Yes.

5 A. Yes, I talk about that.

6 Q. And that's a different expected probability; is  
7 that right?

8 A. It is. And I base that off of a different  
9 sample of data as well. I think I state that that's  
10 from 1980.

11 Q. So you're looking at historic data to come up  
12 with that answer?

13 A. Correct.

14 Q. And exhibits that were provided by the company  
15 in this application do recount for us a significant  
16 amount of history related to certain gas supply  
17 disruptions for a period of 2011 to 2017, if my memory  
18 is correct. Is that right?

19 A. I believe you are correct.

20 Q. And I believe, subject to your check, that  
21 there were 93 threatened supply cuts over that period of  
22 years on the DEQP connections; is that right?

23 A. Subject to check, I believe so.

24 Q. And as it turns out with the -- I don't believe  
25 there was any correlation with any of those outage -- or

1 those disruptions with a Design Day, but, as it turns  
2 out, none of those resulted in an outright cut to retail  
3 service to customers; is that correct?

4 A. That is correct. And it's also correct that  
5 none of those occurred at three degrees mean or colder.

6 Q. Okay. Now if we were to look at a probability  
7 of circumstances based upon that exhibit, which shows  
8 supply disruption, there would be 2,922 days there, and  
9 we might expect a threatened gas supply disruption on  
10 about 93. Could we establish some form of a probability  
11 using that historic data?

12 A. One could but I'm not sure it would be  
13 meaningful because the cuts shown on that actually  
14 include many potential reasons, but --

15 Q. And isn't one reason it might not be meaningful  
16 is, even if we established some kind of ratio between 93  
17 and 2,922, when you multiply it against the consequence,  
18 we might come up with zero risk because there was no  
19 consequence because there was no literal cut to retail  
20 customers. Isn't that right?

21 A. I don't know if it -- I mean, I don't know.

22 Q. Okay. Now, turning to some of the models that  
23 you've run, you've run models that assume certain  
24 pressures at the various city gates that serve your  
25 Wasatch Front distribution facilities; is that right?

1 A. That's correct.

2 **Q. And do you have an assumed delivery pressure in**  
3 **connection with the Kern River connections?**

4 A. Do I have an assumed delivery pressure? The  
5 delivery pressure -- so, just to give you a little  
6 history on Kern River, the facility agreement at those  
7 gate stations guaranteed a pressure higher than our MAOP  
8 along the Wasatch Front.

9 **Q. Okay.**

10 A. However, the volume, as I stated before, is  
11 more important to the pressure downstream than the  
12 pressure upstream. And so if there's 650 pounds of  
13 pressure upstream and the gate station is flowing one  
14 standard cubic foot, the pressure downstream could drop  
15 well below 650 -- it would drop well below 650. It  
16 would drop to whatever the system was around that, if  
17 that makes sense.

18 **Q. I believe it does. Is it safe to say that Kern**  
19 **River runs at a significantly -- a fairly significantly**  
20 **higher pressure than what your distribution system is?**

21 A. 650 versus 354. I mean if that's fairly  
22 significantly higher, that's a determination for someone  
23 else.

24 **Q. Right. Thank you. And that applies to both of**  
25 **the existing Kern River interconnections with your**

1 system?

2 A. Correct.

3 Q. And you also are aware of the soon to be  
4 completed Rose Park interconnection; is that right?

5 A. Looking forward to it.

6 Q. And would the same delivery pressures be  
7 available at that new gate station?

8 A. Right.

9 Q. I asked before -- perhaps you know -- are any  
10 of these Kern River -- well, is the Hunter Park or the  
11 Rose Park Kern River interconnection, either one of  
12 them, located within or near the area that was  
13 designated for the optimal delivery area identified in  
14 the LNG RFP?

15 A. Hunter Park is relatively close to the optimal  
16 delivery location.

17 Q. Okay. And what about Rose Park?

18 A. Rose Park is located, or will be located, when  
19 it's constructed, within that.

20 Q. Okay. Now, what is the status of Dominion's  
21 proposed high pressure trunk line that has been  
22 discussed that might connect the northern portions of  
23 the Wasatch Front with the southern portions?

24 A. The 720 corridor?

25 Q. Yes.

1           A. So, the 720 corridor is what I like to refer to  
2 as the 75-year plan because our entire feeder line  
3 replacement program needs to be completed in order for  
4 it to be also completed. We will have to upgrade the  
5 feeder lines, which is hundreds of miles from Payson to  
6 Hyrum. Line heaters will have to be installed.  
7 Regulation between the 720 corridor and the other MAOP  
8 zones will be required. It's a very extensive project  
9 and we're stepping through it as a vision, an ideal, in  
10 the future.

11           **Q. Do you expect that you will continue to pursue**  
12 **it?**

13           A. We will continue to pursue it.

14           **Q. Okay. Can we assume that that will be a given**  
15 **even though it's a long-term perspective?**

16           A. I don't know that we can assume that it will be  
17 a given, no.

18           **Q. Have any of the planning scenarios and analyses**  
19 **that you have run assumed that the trunk line would be**  
20 **in place?**

21           A. So, in my --

22           **Q. That's a yes or no.**

23           A. Well --

24           **Q. Thank you.**

25           A. The 720 line would be complete -- the answer is

1 no; however, certain portions of it would be complete in  
2 order to benefit certain proposals that we won't get  
3 into, yes. And it didn't perform in that scenario, so  
4 other reinforcements were required.

5 **Q. Would some of those locations that would**  
6 **benefit from that feeder line include the locations from**  
7 **Bluffdale to the magic triangle?**

8 A. So, the Bluffdale location to the optimal  
9 delivery location -- but I like your terminology, so  
10 thank you for that. One of the problems with the 720  
11 corridor at all is that we currently require the  
12 capacity on feeder line 35, which is that 720 line as it  
13 extends north, or will be, we require the capacity.  
14 Since the other gate stations on our system cannot feed  
15 at the pressures, 720, yet it cuts off the supply to  
16 those. And this is -- in my direct testimony -- so,  
17 it's actually a net negative for that to be complete  
18 right now.

19 **Q. What are the pressures assumed coming in from**  
20 **the DEQP pipeline at your various interconnection**  
21 **points?**

22 A. So I think that this is a complicated question  
23 because each -- so, first of all, each year, we do a  
24 joint operations agreement analysis where we take our  
25 Design Day for the current year, determine how it will

1 operate best from a Dominion Energy Utah standpoint,  
2 give those pressures and flows to the Dominion Energy  
3 Questar pipeline team, engineering team, and they run  
4 analysis.

5                   And this is an iterative process until they  
6 come up with a pressure that they will provide on a  
7 design peak day. So say and assume -- I just wanted to  
8 clarify, it's not really an assumption, it's more what  
9 will happen. But, also, I don't remember every single  
10 gate station off the top of my mind. So I'm limited  
11 that way. Sorry, the rain man and I aren't pals.

12           **Q. I didn't check before commencing this but isn't**  
13 **there an assumed tariff delivery pressure coming off the**  
14 **Dominion pipeline?**

15           A. An assumed pressure that is required?

16           **Q. Isn't there a pressure relationship that**  
17 **Dominion Energy Questar Pipeline must meet in connection**  
18 **with its own tariff to serve its customers?**

19           A. There's no guaranteed pressure in our contract,  
20 as far as I'm aware.

21           **Q. Well, okay. We'll take that for now and we'll**  
22 **talk to a tariff expert or consult it that way.**

23           A. Fair enough.

24           **Q. How was the distribution company planning to**  
25 **beef up the pressure for this planned trunk line?**



1           A. So, beefing up the pressure for the planned  
2 trunk line, if you look at the system the way it  
3 operates today, casing pressures come in with a  
4 guarantee only at base at 700 pounds. We feel that as  
5 Dominion Energy Questar Pipeline replaces their existing  
6 pipes, their design standard will be in line with our  
7 future vision. So one of the many reasons why is  
8 because operating lines cost money. And they will be  
9 replacing these lines over time. And hopefully they  
10 will be -- hopefully, they will be replacing these lines  
11 to meet our future needs since we've communicated  
12 regularly about them.

13           **Q. Okay. Do you know what the operating pressure**  
14 **is on the Ruby Pipeline up north?**

15           A. I know that it's relatively high. I'm not sure  
16 the exact number, but I believe that it's greater than  
17 720 pounds. But in regards to that, the Hyrum gate  
18 historical pressures have also upstream been higher than  
19 720 pounds, so --

20           **Q. Okay. Did you run any probability analysis or**  
21 **comparisons between the proposed LNG facilities and some**  
22 **of the other solutions that have been used by the**  
23 **company on a regular basis to solve their supply risks**  
24 **on a regular short-term basis?**

25           A. I'm sorry, I don't understand what

1 probabilities I would be calculating.

2 Q. Well, when we talk about a freeze-off, what's  
3 the probability of a freeze-off and what's the  
4 consequence of the freeze-off? Have you done a specific  
5 calculation on that?

6 A. So I think that if you look at my -- let me  
7 find it.

8 Q. Let me withdraw that question. And I'll just  
9 ask another way, okay? One of the statutory  
10 requirements we have to be mindful of in connection with  
11 this application is that the proposal, we need to have  
12 some kind of assurance, or the commission does, that  
13 whatever facilities we propose will provide a least cost  
14 alternative to deal with the issues that were  
15 identified.

16 Now I know you've done a lot of analysis on  
17 the LNG plant. And I think your analysis is -- has  
18 assured us that the plant, if in place, can respond to  
19 outages at each of the locations. You run scenario  
20 after scenario to prove that.

21 Have you run any analysis to determine  
22 whether or not the installation of the LNG plant to meet  
23 all those needs is more expensive or less expensive than  
24 the different alternatives that are being used right now  
25 to deal with these reliability issues on a short-term

1 **basis? Successfully, by the way.**

2 A. So I think if you recall the 18-057-3, we  
3 looked at all of the options. In this docket, Mr.  
4 Schwarzenbach looked at the options that were proposed,  
5 and the LNG facility was the least cost option. So, I  
6 don't see -- I guess I don't understand how a system  
7 analysis and a cost analysis are related. And since  
8 the supplier reliability review analysis that  
9 Mr. Schwarzenbach presented has already been covered, I  
10 don't understand what your question is.

11 Q. Then is it fair to say that your testimony  
12 doesn't deal with a comparative analysis of the LNG  
13 facility being a solution compared to the cost and  
14 effectiveness of some other solution that may have been  
15 discussed by Ms. Faust or Mr. Schwarzenbach? Is that  
16 right?

17 A. My testimony is focused on the system analysis  
18 and the risk. That's not a cost comparison.

19 Q. Okay. That's what I wanted to know. Thank  
20 you. I have no further questions.

21 COMMISSIONER LEVAR: Mr. Russell?

22 MR. RUSSELL: Thank you Mr. Chairman.

23 CROSS-EXAMINATION

24 BY MR. RUSSELL:

25 Q. Good afternoon, Mr. Platt. How are you?

1 A. Good afternoon. How are you?

2 Q. Doing okay. I want to talk a little bit about  
3 some of the modeling that you ran a little bit. You, in  
4 your testimony, describe a model that you ran in an  
5 effort to determine the loss, the magnitude of the loss  
6 to customers in the event that there's a 150,000  
7 decatherm shortfall on a Design Day, right?

8 A. It does.

9 Q. Okay. Can you explain -- you set forth your  
10 testimony -- but maybe it's probably quicker for you  
11 just to do it again. Can you just explain to us what  
12 assumptions you made in running that model?

13 A. So, in setting up this model -- and I won't  
14 read verbatim -- I used Design Day model, so, standard  
15 process. And then I removed 150,000 decatherms from the  
16 supply to that. And I ran the model until I hit a zero  
17 pressure for the model scale. So I mean --

18 (Briefly off the record.)

19 Q. I will say for the record, I won't feel  
20 offended if you don't face me while you're answering the  
21 question, if it's easier for you to speak in the mic  
22 that way.

23 A. I'd prefer to face you.

24 Q. Yeah, that's fine.

25 A. It feels like I'm talking to a person then.

1 (Briefly off the record.)

2 A. So I will get as close as I possibly can, even  
3 though my voice is annoying to myself. So where was I?  
4 So a Design Day, standard conditions, synergy gas  
5 software, unsteady state analysis, when you initiate the  
6 analysis, it starts to count through time. And so at  
7 the time that my pressures in the system reached zero  
8 psig, the model fails.

9 And so at that point, I, in order to  
10 represent what might happen in reality, I removed the  
11 demand at that point using a profile that would go to  
12 that point and then dropped the demand to zero because  
13 nothing would be flowing at that point. I stepped  
14 through and did this a number of times until I had a  
15 model that would completely solve and give me the  
16 resulting pressures.

17 I then took the pressures at these  
18 regulator stations and calculated for each regulator  
19 station for the types of regulators that they have in  
20 them the remaining capacity. If there's a greater than  
21 zero pressure, I took that value for each of the  
22 hundreds of regulator stations that were at sub  
23 operational pressures and loaded my IHP models, which  
24 are separate models, with that new capacity at each reg  
25 station and then solved it and determined where

1 pressures fell below five pounds, which is where the  
2 majority, or at least we think, our IHP will lose  
3 service because there won't be pressure to push it  
4 across their service regulator and meter. Then I  
5 counted all those customers up. And that's how I  
6 determined that value.

7 Q. Okay. You indicated that you used a Design Day  
8 model. Is it -- is that a Design Day model for current  
9 conditions?

10 A. That is a Design Day model for the current  
11 year, yes.

12 Q. Okay. And you assumed a loss of a hundred  
13 fifty thousand decatherms at, I think -- was it  
14 Riverton?

15 A. It was Riverton for the specific part of this  
16 analysis, yes.

17 Q. Right. And then I think I understand your  
18 testimony to indicate that you asked the model to assume  
19 a 150,000 decatherm loss at Riverton two hours prior to  
20 peak hour on that peak day?

21 A. Right. So, about six a.m.

22 Q. Okay. This is going to come across as an  
23 ignorant question, and I apologize for that. When you  
24 asked the model to assume a loss of 150,000 decatherms  
25 per day, is that 150,000 decatherms at once or is it

1 over a period of time? I'm trying to figure that out.

2 A. So, don't feel bad. I talk to engineers every  
3 day that don't understand exactly what we're talking  
4 about. So, 150,000 decatherms per gate rate. That's  
5 the rate of volume coming through that gate station.  
6 And so I'm not reducing the amount of gas in the system  
7 by 150,000 decatherms by making it evaporate, I'm  
8 cutting the volume rate coming through that gate down by  
9 150,000.

10 Q. And what effect does that have on the number of  
11 decatherms that you might receive in a day?

12 A. So, if we look at this and at six a.m., you  
13 reduce by 150,000 decatherms, that means that you are  
14 getting 150,000 for six hours that you lost for another  
15 18 hours, right? So you would have to say two-thirds of  
16 that, or a hundred thousand decatherms at the end of the  
17 day is gone.

18 Q. Okay. So, I think I understood that but I'm  
19 going to try to put it in words that I actually  
20 understand. Does that -- by dropping it by 150,000  
21 decatherms per day by that rate, if you assume that  
22 shortfall over -- is it a 24-hour period? You will have  
23 lost by the end of that 24-hour period 150,000  
24 decatherms? Is that how it works?

25 A. So, if the analysis had lost that rate for 24

1 hours, it would be 150,000 decatherms that you lost for  
2 that day. But since it starts at six -- and I'm doing  
3 bad math because six and 24, that's a quarter. So I've  
4 never felt pressure before in my life but -- and I don't  
5 get nervous in these types of situations. So you would  
6 be missing a quarter of 150 at the end of the day. So  
7 it would be a little bit more than 100.

8 **Q. So you'd lose three-quarters of a hundred and**  
9 **fifty at the end of the day; is that right?**

10 A. Right.

11 **Q. Okay.**

12 A. Right.

13 **Q. Okay. I think we're there.**

14 A. We're solid.

15 **Q. Okay, I think we're there. Thank you. And**  
16 **when you ask it to assume a loss of a hundred and fifty**  
17 **thousand decatherms per day, that rate, does that**  
18 **correspond with certain NAESB cycles where you would**  
19 **lose a certain amount with this cycle or this cycle, or**  
20 **are you just asking it to assume a loss spread evenly**  
21 **over the next 18 hours?**

22 A. A loss spread evenly.

23 **Q. Okay.**

24 A. And if you look at the way the Hunter Park and  
25 Riverton gates are designed, they're flow set. So if



1 we lost a hundred and fifty, it would be exactly like  
2 that.

3 Q. Okay. And when you say you just -- you asked  
4 it to assume that loss of rate two hours before peak  
5 hour, you said six o'clock. So does that mean peak hour  
6 is eight o'clock?

7 A. Peak hour is at 8:30, so it's actually 6:30.  
8 But --

9 Q. Sure. You had also run -- I'm going to talk  
10 about some different modeling you had run against the  
11 proposals received from the RFP. And that model is  
12 slightly different than this one in that it is a 2023  
13 Design Day model, correct?

14 A. Correct.

15 Q. And so can you explain to me the difference  
16 between a 2023 Design Day model and the current Design  
17 Day model that you ran against that Riverton situation  
18 we just talked about?

19 A. So the difference in the 2023 Design Day model  
20 is that if you look at the most recent IRP, there's a  
21 peak day demand volume for each year. So, it is  
22 projecting that 2023 amount. It's actually not too  
23 different from the different peak day in absolute terms,  
24 but because this isn't going to be in service until  
25 about then, it didn't really make sense to evaluate it

1 using a 2019 peak day.

2 And there are going to be system  
3 reinforcements that occur between now and then that are  
4 planned. Those are also in the --

5 Q. And are there -- with those system  
6 reinforcements, are there also volume differences in  
7 what the volume of the gas in the system is now versus  
8 what there will be in 2023?

9 A. Right. So, I mean, contracts will change. And  
10 there are some assumptions there, but there are also  
11 some knowns.

12 Q. Okay. And all I'm trying to get at is you took  
13 into account those changes as well?

14 A. Correct.

15 Q. We don't need to talk about what the specifics  
16 are. You in your testimony indicated that all of the --  
17 all of the proposals that delivered to the optimal  
18 delivery location, whether by design or with  
19 reinforcements, were able to meet system requirements  
20 when you ran those models, right?

21 A. Correct. Options that deliver in the optimal  
22 delivery zone met our customers' needs.

23 Q. Okay. And that includes the options that got  
24 there through reinforcements, right?

25 A. Right.

1           **Q. Okay. There was a small paragraph -- and I can**  
2 **find it if we need it -- indicating that delivery into**  
3 **the optimal delivery location may end up losing one**  
4 **customer in Payson, right?**

5           A. So, if there's a Payson outage -- and, I'm  
6 sorry that you don't have the Wasatch Front system  
7 memorized like I do -- but from Payson to about  
8 Vineyard, our system operates at an MAOP of 720 pounds.  
9 And there's a customer, a small customer, that requires  
10 about 210,000 decatherms per day and a pressure of 525  
11 pounds at the end of that line. You might be able to  
12 think of who that is.

13                       If the pressures drop below 525, that  
14 customer will no longer be served. So in a Payson  
15 outage, in any scenario, that customer is going to lose  
16 service or will have to switch delivery points for their  
17 own gas supply.

18           **Q. You say in any scenario. Does that include the**  
19 **scenarios where delivery is made at Bluffdale?**

20           A. Right.

21           **Q. Okay. So it wasn't just the deliveries into**  
22 **the optimal delivery location, it was all of the**  
23 **proposals failed to meet that?**

24           A. Right.

25           **Q. Okay.**

1 A. In that gate station outage scenario.

2 Q. Okay. I misunderstood your testimony on that  
3 point. I want to talk a little bit about what you --  
4 what assumptions you made in using this 2023 Design Day  
5 model with each of the proposals in the RFP. We kind of  
6 walked through some of those assumptions for the  
7 Riverton outage scenario. Did you do the same thing  
8 with respect to the proposals in the RFP? We talked  
9 about a loss of a hundred fifty thousand decatherm rate.  
10 Was it that same --

11 A. It's the same idea. The only addition that I  
12 would put to that is that there are some gate stations  
13 that are not capable of feeding 150,000. So in those  
14 scenarios, they just fed whatever their capacity was.

15 Q. Yeah, I think in your testimony Sunset was one  
16 of those.

17 A. Right. So Sunset's physical capacity is like  
18 93 million cubic feet per day. But its actual flowing  
19 capacity at pressure that's meaningful is somewhere  
20 around 75. So, it is about half of what the shortfall  
21 scenario at other gate stations would have been but --

22 Q. Got it. Now, we've talked about these two  
23 Design Day models and that there was some changes made.  
24 In a current Design Day model, do you know what the  
25 capacity of the Hyrum gate station is?

1           A. The capacity at the Hyrum gate station in the  
2 current model is about 142 million, so 142,000  
3 decatherms. It's pretty close to 150.

4           Q. That's a question I've been meaning to ask. So  
5 there's different uses of the hundred and fifty million  
6 cubic feet per day and a hundred fifty thousand  
7 decatherms per day. Are those essentially the same  
8 thing?

9           A. For purposes of this discussion, they are  
10 essentially the same thing.

11          Q. When you go back to your office and talk to  
12 your engineers, I assume there might be a difference.  
13 But for our purposes, we don't need to know what that  
14 difference is?

15          A. No, it's close enough.

16          Q. So, in terms of the current capacity at Hyrum,  
17 it doesn't have a 150,000 decatherm capacity. I assume  
18 that in the -- my understanding is that in the 2023  
19 Design Day model, that gate station has an upgrade to  
20 it, right?

21          A. Right.

22          Q. And what is that upgrade?

23          A. So, with the completion of feeder line  
24 replacement between Hyrum, feeder line 40 and feeder  
25 line 19, it's increasing from 12 inch to 24 inch. And

1 along with that, there's plenty of upstream capacity at  
2 the Hyrum gate station. So there's a hundred thousand  
3 extra decatherms of supply there.

4 **Q. I had you right up until the end. So there's a**  
5 **hundred thousand extra decatherms of Hyrum how?**

6 A. So, this is -- I'm sorry. So, take away  
7 capacity matters and take away capacity. When I use it,  
8 I'm talking about the system's ability to take gas from  
9 the gate station and deliver it to the customers.

10 So, when our feeder lines are replaced with  
11 a larger diameter, we will be able to take more gas.  
12 And that gas is about a hundred thousand more  
13 decatherms.

14 **Q. Okay. And when you're talking about your**  
15 **feeder lines, you're talking about lines that feed into**  
16 **that gate station on a distribution system, right?**

17 A. I'm talking -- yes, except feed out of that  
18 gate station.

19 **Q. Oh, feed out of the gate station to customers,**  
20 **right. Okay.**

21 A. Right.

22 **Q. So the customers with those upgrades to that**  
23 **system will have more access to more gas from that gate**  
24 **station?**

25 A. Correct.

1 Q. More quickly?

2 A. Well --

3 Q. Well, perhaps.

4 A. We can talk about response time but that will  
5 take us down another rabbit hole that's going no where.

6 Q. Let's not. So -- okay, we've -- I think you've  
7 educated me on at least some of this stuff. So, walk me  
8 through the modeling that you ran for the -- you've  
9 heard us talk, I think, about the Magnum proposal or  
10 Option 1A where there was an assumption of delivery to  
11 Bluffdale.

12 A. So, any option that delivered to Bluffdale, I  
13 placed the source not unlike any other source in my  
14 model. So, there are source nodes. And the response  
15 time -- oh, I lost it.

16 Q. Ah-oh.

17 A. Am I back?

18 Q. Yes.

19 A. Sorry. So, the response time for all scenarios  
20 that I ran was ten minutes. So I assumed in my modeling  
21 that ten minutes from when the shortfall began, the  
22 response would also instantly replace the hundred and  
23 fifty thousand.

24 So at each gate station for each scenario,  
25 all of the 40 models that I ran for every possible

1 option at every possible gate station, I did this. And  
2 I stepped through time to see what would happen.

3 Now, the Bluffdale option without  
4 reinforcements, with a Hyrum outage, which I think is  
5 where we're going, and I'm just going to take us  
6 there --

7 Q. Sure.

8 A. After replacing that volume, pressures began to  
9 drop because it's such a far extent and you're not  
10 getting the pressure up to the 471 zone. And so, at  
11 some point -- and I think it's a couple hours into the  
12 analysis, I don't recall exactly -- basically every  
13 customer from Brigham City north has lost service.

14 Q. Okay. And you indicated that you assumed a ten  
15 minute response time for each proposal, right?

16 A. Right.

17 Q. And do you -- so we have 150,000 decatherm rate  
18 drop at Hyrum two hours before the peak hour, right?

19 A. Yes.

20 Q. And so ten minutes later, we have in your  
21 model, the option of Bluffdale responding by injecting  
22 a hundred fifty thousand decatherm per day rate into the  
23 system, is that right?

24 A. Correct.

25 Q. And at what point in -- as you run that model



1 through, do you know how long it takes before customers  
2 start losing power?

3 A. So, customers losing power isn't -- I'm not a  
4 power guy.

5 Q. Sorry, I --

6 A. But customers --

7 Q. -- you every once in a while. When a customer  
8 is losing service.

9 A. So, like I said, I don't remember. I would  
10 have to bring up my model results. But I think that the  
11 first customer loses service within a couple of hours.  
12 So it's pretty fast and in model time.

13 Q. Okay. Before running that type of modeling  
14 against the proposals, what did you do to determine what  
15 analysis you were going to run against each of the  
16 proposals? Did you speak with anyone else at the  
17 company or was it entirely your idea to run the model  
18 this way? How did the company determine that that's the  
19 model it wanted to run?

20 A. So, I talked to my colleagues and discussed how  
21 I was going to evaluate this. I talked to the employees  
22 that work for me in the system planning group about how  
23 I was going to evaluate them and make sure that everyone  
24 thought what I was doing was fair and how I was going  
25 about it was the right way. Because, often when we are

1 unchecked, we choose something and we're not really  
2 being fair.

3                   So I went out of my way to make sure that  
4 everybody who had any expertise in the area agreed with  
5 my method. And they did.

6           **Q. Did you talk to folks in the gas supply side of**  
7 **the company to determine if it would be possible for a**  
8 **single gate station to experience the type of shortfall**  
9 **we're discussing here?**

10           A. William Frederick Schwarzenbach, the third, and  
11 I did speak. And we have spoken on a number of  
12 occasions about the types of shortfalls and how they  
13 might affect our system, yes.

14           **Q. Okay. And did you talk about -- this is going**  
15 **to get a little bit more into the risk side of things,**  
16 **which I haven't talked about with you yet. But did you**  
17 **determine the probability of a -- of this kind of supply**  
18 **shortfall at each gate station?**

19           A. I did not. And I think that, you know, what  
20 happens upstream is a little outside of my realm. So I  
21 didn't get into how probable each scenario might be. I  
22 know that, from experience and just talking to Will --  
23 and maybe if he were up here, he would slap me and tell  
24 me I'm wrong -- but a lot of our gas supply comes from  
25 Wyoming. That's close to Hyrum. It is a concern to me

1 that we might not have gas show up there.

2           And there are different lines that feed  
3 Hyrum than the Coalville, Sunset, Porter's Lane, Little  
4 Mountain system. So it is a little isolated. I think  
5 that -- I mean, just from intuition, the Coalville  
6 system -- because it connects at Coalville and there's  
7 not really any supply downstream, may be a little less  
8 unlikely based on a freeze-off scenario. But as far as  
9 mechanical failure or improper operations, human error  
10 type failures, they're just as likely at any gate  
11 station.

12           **Q. Sure. And so for your purposes in running the**  
13 **modeling, it was enough to determine that it was**  
14 **possible. You didn't look into the issues of how likely**  
15 **a 150,000 decatherm per day shortfall at a given gate**  
16 **station might be?**

17           A. I think that's a fair assessment.

18           **Q. You had indicated in your response to questions**  
19 **from, I think it was Mr. Snarr, that you participated in**  
20 **the evaluation of what reinforcements would be required**  
21 **to get from the Bluffdale delivery location to the**  
22 **optimal delivery location. Did I hear that right?**

23           A. Right. I did participate in determining what  
24 reinforcements would be required.

25           **Q. Okay. I want to ask what those are but I don't**

1 know whether that's confidential. I don't know that  
2 it's been described in the testimony, but --

3 MR. SABIN: Yes, as long as we're not  
4 going into the costs of the reinforcement, you can  
5 discuss the engineering aspect of it, if that's where  
6 you're going.

7 Q. Yes, I'd just like to know what it is.

8 MS. NELSON-CLARK: I would also be wary  
9 of...(inaudible).

10 (Briefly off the record.)

11 MR. SABIN: She was just saying, you want  
12 to be sensitive to time, particularly reinforcements,  
13 particularly bidders, because that might go into highly  
14 confidential information. Certainly if you want to talk  
15 about your own clients' reinforcements, that's up to  
16 you.

17 Q. Yes, I -- okay. I think we're okay.

18 MR. SABIN: I wasn't sure if you were doing  
19 that to me or --

20 COMMISSIONER LEVAR: This is probably a  
21 good time for a five minute break anyway. And so why  
22 don't we come back at 4:20.

23 (A ten minute recess was commenced.)

24 COMMISSIONER LEVAR: Okay. We're back on  
25 the record. Mr. Russell?

1 MR. RUSSELL: Thank you, Mr. Chairman.

2 Q. (By Mr. Russell) We ended with a question that  
3 indicated we were going to use reinforcements. We will,  
4 but I need to backtrack just a second. We talked about  
5 whether it was possible to -- for each gate station on a  
6 company's distribution system to experience a 150,000  
7 decatherm per day loss. I want to ask that question a  
8 slightly different way. Is it possible for the company  
9 to not have warning of a loss at each gate station until  
10 it reaches that point where it's a hundred fifty  
11 thousand decatherms per day?

12 A. So, if the question -- am I close enough? If  
13 the question is, is it possible that the company might  
14 not have any warning that 150,000 decatherm per day rate  
15 shortfall could occur at each gate station, the answer  
16 is yes. And so if we look back at the supply  
17 reliability risk analysis, we're not just looking at  
18 freeze-offs, right? We're also looking at earthquakes,  
19 landslides, cyber attacks, inappropriate or inadequacy  
20 of the design or maintenance and, as Mr. Paskett pointed  
21 out, internal and external corrosion, corrosion  
22 cracking, and there was one other that he pointed out  
23 that wasn't in the supply reliability risk analysis.

24 And I would say that there are a number of  
25 other things that could happen that the company would

1 have no indication prior to the shortfall actually  
2 occurring, many possibilities.

3 Q. In your modeling, did you conduct -- did you go  
4 to an effort to determine the rate of shortfall at  
5 which the Magnum Option 1A could meet that shortfall at  
6 Hyrum?

7 A. So, I think that -- I think that what you're  
8 asking me is, per the requirements set out in the RFP,  
9 did I evaluate other criteria? And the answer would be  
10 no, I didn't evaluate options that weren't presented. I  
11 didn't evaluate lower shortfall scenarios. I evaluated  
12 what the company determined as the need and what would  
13 be required or how that option would respond to those  
14 scenarios.

15 Q. Well, okay. But the RFP itself didn't say, it  
16 needs to meet 150,000 decatherm per day shortfall at  
17 each gate station, that's a model you ran after the RFP  
18 responses came in, right?

19 A. But I think that since the shortfall could  
20 occur at each gate station and the RFP said we need a  
21 resource that supplies this and has similar system  
22 performance or meets our customer needs and these are  
23 scenarios that are realistic, I don't think that the  
24 analysis that was done was inappropriate. I think it  
25 was exactly appropriate.

1                   And, as you suggest, lower volumes -- well  
2 the RFP didn't say, we want a lower volume resource. So,  
3 that would be a pointless analysis.

4           **Q. Do you have the RFP there? I think it's**  
5 **Schwarzenbach 3.02, Exhibit 3.02.**

6           A. I do have it in front of me.

7           **Q. Will you turn to page 2 and to footnote one at**  
8 **the bottom? And I'll just go ahead and read it. It**  
9 **says, "DEU will consider proposed options that will**  
10 **provide less than 150,000 decatherms per day of**  
11 **deliverability, however, preference will be given to**  
12 **proposals that meet the full 100,000 decatherms per day,**  
13 **either on its own or in conjunction with other**  
14 **proposals."**

15                   **If the company were willing to accept**  
16 **proposals that injected something less than 150,000**  
17 **decatherms per day, wouldn't any such solution fail your**  
18 **modeling test?**

19           A. So I think that this statement is getting at,  
20 yes, there could be multiple proposals of less than 150,  
21 but if we had a proposal that, for instance, delivered  
22 145,000 decatherms and couldn't quite meet the 150, is  
23 it possible that in conjunction with that and line pack  
24 it could meet our customers' needs. Yes, it could.

25                   But at some point would that proposal

1 volume hit a limit where it would need another resource  
2 to make up the need? Yes. And I didn't analyze what  
3 that was because no proposals that were offered less  
4 than 150,000 decatherms. So I don't feel like making up  
5 proposals.

6 Q. Yes, I guess I understand that. I was just  
7 wondering if you had run the proposals against  
8 something -- against a shortfall of something less than  
9 a hundred fifty just to determine where that line  
10 between success and failure was. With respect to this  
11 particular one -- you don't have to go into the rest.

12 A. So, let me draw out how that would look just so  
13 that --

14 Q. It would be a lot of time, I'm guessing.

15 A. It would be a lot of analysis. And what does  
16 it show, right? So, if 150,000 decatherms, I ran 40  
17 different models for all of the options provided,  
18 including our LNG facility, shortfalls at each gate  
19 station, if I'm being fair, should I not run each  
20 proposal at that lower volume and also at every  
21 iteration to get down to that volume where it works? It  
22 becomes unmanageable.

23 Q. Understood. But in any event, you didn't do  
24 that with respect to the Magnum Option 1A to determine  
25 what shortfall it could be at a higher rate?



1 A. I didn't perform that analysis with any option,  
2 no.

3 Q. Okay. And, so if it's possible to upgrade some  
4 other portion of the system to allow that option to meet  
5 a shortfall of 150,000 decatherms per day at Hyrum, we  
6 don't know that. If there's a way to -- I mean is it --  
7 if it would be meet a -- if that option would meet a  
8 130,000 decatherms shortfall, total hypothetical, but  
9 with some other system reinforcement, it might meet 150,  
10 we just don't know?

11 A. So, in my testimony, and this is a fact, the  
12 reinforcements that were added to any option that  
13 delivered outside the optimal delivery location were the  
14 minimum system for 150.

15 So, in this hypothetical question, could a  
16 Bluffdale option perhaps meet a 130,000 decatherm  
17 shortfall at Hyrum with a lesser extent of recent  
18 reinforcement, I'm sure that there's a line but it's not  
19 going to be zero reinforcement.

20 The problem really is that between the  
21 Bluffdale location and the 471 zone, there's so much  
22 pressure loss in the system and/or lack of capacity that  
23 it's not reasonable to make up significant shortfalls  
24 from the Hyrum. So would I expect that 130 would be the  
25 line? No, I don't. I think it would be a very small

1 and insignificant shortfall amount.

2 **Q. But the fact is we don't know, right?**

3 A. We don't know. But I've done enough analysis  
4 to know that it's not -- it's not going to be a  
5 significant shortfall that would have been able to be  
6 accounted for at the Bluffdale location without the  
7 reinforcements specified.

8 **Q. And so we also don't know what reinforcements**  
9 **would be necessary to bridge the gap, whatever the gap**  
10 **is, between what that delivery option does meet at Hyrum**  
11 **and where it would need to get to satisfy the system**  
12 **requirements in the event of a 150,000 decatherm**  
13 **shortfall at that gate station, right?**

14 A. So, I think that the question you just asked is  
15 do we know the reinforcements required to meet a 150,000  
16 decatherm per day shortfall at Hyrum. And I think  
17 that's what was specified. So either I misheard you or  
18 there is another question in there that got lost  
19 somewhere on me.

20 **Q. Well the reinforcements that are assumed with**  
21 **respect to the Magnum Option 1A are the reinforcements**  
22 **that are required to get it to deliver into the**  
23 **optimum --**

24 A. Optimal?

25 **Q. -- optimal delivery location, correct?**

1           A. Right.

2           **Q. And do we know whether that -- whether delivery**  
3 **into the optimal delivery location is itself required to**  
4 **satisfy the hundred and fifty thousand decatherm per**  
5 **day shortfall at Hyrum or whether there is some lesser**  
6 **reinforcement that would satisfy that requirement?**

7           A. The reinforcements specified are the minimum  
8 system requirements for the Bluffdale option to account  
9 for that shortfall. So if a lesser shortfall -- and I'm  
10 imagining hypotheticals, and I don't know the specifics  
11 without running analyses -- but if a lesser shortfall  
12 could be met with lesser reinforcements, what I would  
13 say about that is I think that there are other potential  
14 options that maybe could have accounted, but a Bluffdale  
15 delivery location required a certain length of pipe and  
16 a certain capacity in that pipe.

17                           And so unless you get to such a small  
18 number that you no longer have to run that length of  
19 pipe, that reinforcement is appropriate for lesser  
20 shortfalls, if that makes sense.

21           **Q. I think it does. Let's talk about the**  
22 **reinforcements themselves. I had asked you a question**  
23 **before we took a break and we've now been on a tangent**  
24 **for a few minutes, and that's my fault.**

25                           The information I'm trying to get out of

1 the question about reinforcements is there's been some  
2 discussion about the reinforcements that are required to  
3 get from the Bluffdale delivery location to the optimal  
4 delivery location. There's been a separate discussion  
5 about Dominion's sort of long-term plan to upgrade to  
6 this high pressure corridor, some of which would be  
7 installed somewhere between sort of the Wasatch -- well  
8 the Salt Lake delivery center and Bluffdale. My  
9 question to you is: How much overlap is there between  
10 those two discussions?

11 A. So, the reinforcement required is actually a  
12 new feeder line. And using the existing feeder line --  
13 and I have this discussion probably in more detail in a  
14 confidential section of my direct testimony, which we  
15 won't have to go to -- but running a new line is  
16 required, and there is no overlap because the capacity  
17 that exists in that line and will exist when the 720  
18 corridor is completed in 75 years or whenever we get  
19 done with all the replacement and upgrades that is  
20 required is required for the demand on the system  
21 without a shortfall.

22 And so by operating that now or in 2023 for  
23 the purpose of a supply reliability option without the  
24 remainder of the project complete, which will take a  
25 long time, it's basically removing that pipe and its

1 capacity out of the system. So can we take a 24-inch  
2 pipeline out of the system and still meet peak days?

3 The answer is no. Does that make sense?

4 Q. Not to me. Maybe to others who are in the  
5 room. Sorry. What I think I heard you say was that  
6 there -- I think you were explaining why there isn't any  
7 overlap, okay?

8 A. There is no overlap. That's the bottom line.

9 Q. Okay. I want to talk about some of the  
10 assumptions in the peak day -- in the 2023 peak model  
11 that you used, peak day model that you used. Does that  
12 include any upgrades related -- or that would sit  
13 between where the LNG plant is sited and the optimal  
14 delivery location or where that gas would have to flow?

15 And I don't know whether that's helpful. I  
16 don't think it is but -- I'm not intending to ask a  
17 confidential question.

18 A. So, the 2023 protected model doesn't include  
19 any reinforcements or any pipelines that aren't  
20 specified in testimony and are not planned without the  
21 LNG plan.

22 Q. No, I understand that there is -- there are  
23 some upgrades that are planned separate from the LNG  
24 plan. I'm just wondering if those were taken into  
25 account in the 2023 model?

1           A. But I think what you asked, is there anything  
2 between the LNG facility and the optimal delivery  
3 location. And the only thing is the tap line that would  
4 be required to get from the LNG plant to the optimal  
5 delivery location.

6           **Q. And that tap line would connect to a feeder  
7 line that will be upgraded, right?**

8           A. It will be upgraded.

9           **Q. Okay. When will that occur?**

10          A. I don't know the schedule. I know it's in the  
11 next couple of years.

12          **Q. Before the proposed online date for the LNG  
13 plant?**

14          A. Correct.

15          **Q. Okay. And so that upgrading is included in the  
16 Design Day model?**

17          A. Correct.

18          **Q. That's what I was trying to ask. Okay.**

19                    I think I am out of questions for you.

20          **Thank you.**

21                    COMMISSIONER LEVAR: Thank you. Any  
22 redirect?

23                    MR. SABIN: Just a few questions. Thank  
24 you.

25                                    REDIRECT EXAMINATION

1 BY MR. SABIN:

2 Q. Mr. Platt, several of the attorneys here have  
3 asked you questions about pointing out that the company  
4 hasn't, at least in recent memory, and maybe even  
5 further back, had an outage of the kind we're talking  
6 about here. Do you think that it is reasonable to wait  
7 for either the Design Day or some sort of outage before  
8 you plan for that kind of eventuality?

9 A. I do not. And let me explain a little further.  
10 I think that the Southwest Gas incident and the Enbridge  
11 Pipeline or Fortis, BC situation that occurred last year  
12 are two good examples of industry experience with this  
13 specific scenario.

14 And we would be foolish to ignore what's  
15 happened to other companies. We don't want to lose  
16 40,000 customers. We want to have LNG on the system  
17 like Fortis, BC does so that when it occurs -- and it  
18 will -- we are prepared.

19 Q. Is it customary for companies -- for LDCs in  
20 the nation to share information to learn from one  
21 another to discuss problems that come up and mutually  
22 address them?

23 A. It is. And I believe that one of the  
24 organizations where people need to discuss these things  
25 as far as LDCs are concerned is the American Gas

1 Association, or AGA, that Mr. Paskett has participated  
2 in for many years. We have personnel at the company  
3 that participate in AGA and we discuss industry problems  
4 and try to share best practices and learn from each  
5 other all the time.

6 Q. And when an event occurs for some other LDC,  
7 let's say serious event like the Southwest Gas or like  
8 the Enbridge event, is that something that you guys talk  
9 about internally as you plan and as you strategize for  
10 avoiding those kinds of events?

11 A. Absolutely. If we ignored the news and what's  
12 happening in the industry, we would be far behind in --  
13 I mean, that's just bad practice. And we try to  
14 address everything as we become aware of issues in the  
15 industry.

16 Q. I want to be very practical in the last few  
17 questions I have. What I want you to focus on as I ask  
18 these questions is just this -- in each case, I want you  
19 to talk to us about how a supply reliability resource  
20 located in the optimal delivery area would help each of  
21 these situations, or potentially help them. Okay? Do  
22 you follow?

23 A. Okay.

24 Q. So, Mr. Russell asked you about some of these  
25 single event occurrences that might happen. So, let me



1 just take a couple of examples. If there were an  
2 occurrence -- can you think of an occurrence -- let's  
3 take the Hyrum gate station -- of a single event  
4 occurrence that could result in that specific gate  
5 station failing or not providing the hundred and  
6 forty-two or three, I don't remember what you said,  
7 thousand decatherms of gas during a day? Can you think  
8 of an event where that could realistically happen?

9 A. So, the Hyrum gate station is fed by a long  
10 straight pipe. And so if there were supply shortfalls  
11 upstream of that, it could directly impact the Hyrum  
12 gate station, absolutely. In addition, anywhere along  
13 that long, straight, singular pipe, third-party damage  
14 could occur, a landslide could occur, an earthquake  
15 could occur. Any number of things could occur to the  
16 valve assemblies. Cyber attacks could occur. And  
17 potentially things could change from a gas control  
18 standpoint, which I hope never happens to us or anyone.

19 Failures at the gate station could occur.  
20 There are -- from what I understand of this specific  
21 gate station, there's a single pipe going in and a  
22 single pipe going out for miles. So anything could  
23 happen to the pipeline downstream and anything could  
24 happen to the pipeline upstream.

25 Gate stations are very complex pieces of

1 equipment. And so there are lots of potential failures  
2 that could occur at that gate station that are listed  
3 and in our supply reliability document.

4 **Q. So, if an event like that occurred in**  
5 **Monticello, you have just a physical -- somebody makes a**  
6 **mistake, closes the valve -- closes the valve to the**  
7 **gate station and you don't have gas flowing for a period**  
8 **of time, is that a realistic -- tell me, what would be**  
9 **the impact of that at the Hyrum gate station?**

10 A. So if a valve upstream of the Hyrum gate  
11 station were shut the gas flowing to the Hyrum gate  
12 station would stop. It would drop to zero. The  
13 pressures locally would drop and that would expand out.

14 Without a supply reliability resource, we  
15 would start to lose service to customers. And that,  
16 depending on the temperature, could expand to up to  
17 650,000 customers.

18 **Q. So now if we expand that to the larger system,**  
19 **not just Hyrum, are there other gate stations that are**  
20 **serviced by just one feeder line or one -- is that the**  
21 **right term?**

22 A. Well, on the transportation side, they're  
23 called main lines --

24 **Q. Main lines?**

25 A. -- or --

1 Q. Are there other stations, gate stations, that  
2 are serviced just by, or where the gas comes just by one  
3 main line?

4 A. Well, all of them more or less have one line or  
5 one alignment feeding them. And that's even including  
6 the Little Mountain gate station, which has two physical  
7 pipelines in the same alignment feeding it from  
8 Coalville to Little Mountain. If something happened to  
9 that alignment, like a landslide, it would take both  
10 lines out, or both lines would be -- service would  
11 likely be stopped because of the risk, if there was a  
12 landslide, for instance, of rupture affecting both  
13 lines, so --

14 Q. So, in other words, if I'm hearing you right,  
15 what we just talked about with Hyrum, all of those  
16 issues that could affect that one main line coming in  
17 could happen at any one of those gate stations with a  
18 very similar result?

19 A. Correct.

20 Q. Now, talk to me about -- we now have a  
21 facility, whether it's an LNG or some other resource,  
22 that delivers into that optimal delivery zone. How  
23 would that help us respond to those particular incidents  
24 at each of those gate stations, if you'd talk about that  
25 for a minute. And get very practical. I want you to

1 just -- we're interested in knowing what would that  
2 resource do for you in that event?

3 A. So, in that event, assuming that it was a day  
4 where that gate station was flowing 150,000 decatherms  
5 rate or less, the LNG plant would start vaporizing or  
6 ramp up vaporizing into the system at the rate of the  
7 loss and it would mitigate a loss of service to  
8 customers by replacing that supply and providing  
9 pressure support to the system so that instead of  
10 pressures dropping to suboperational pressures, that  
11 pressure in the heart of the system at the optimal  
12 delivery location extends out both north and south  
13 preventing suboperational pressures anywhere.

14 Q. So it would be true, is it not, that up to 150,  
15 that facility or that resource could solve a shortage up  
16 to 150,000?

17 A. Correct, based on any cause.

18 Q. And then there are some gate stations that  
19 actually flow more than 150,000 decatherms in a day,  
20 right? At those gate stations, would a facility or  
21 resource located in that same region, the optimal  
22 delivery zone, would the LNG facility have any benefit  
23 if -- or could it have any benefit if there was  
24 something that occurred at a gate station that was  
25 flowing more than that?

1           A. It could. It's a little less certain what the  
2 result of that would be. But let's say hypothetically  
3 that something happened at the Porter's Lane gate  
4 station, which is capable of feeding a bit more than  
5 150, that LNG facility would be able to absorb the  
6 initial impact and slow the loss of pressure in the  
7 system so that other mitigative actions could be taken  
8 to minimize the loss of service or completely eliminate  
9 it if such options exist.

10           Q. And let's take Porter's gate station for a  
11 second. It flows more than a hundred fifty at some  
12 times of the year. Is that true all year?

13           A. No.

14           Q. So would a resource located in this area we're  
15 talking about, could it help at times where it wasn't  
16 flowing above 150, I assume?

17           A. Absolutely.

18           Q. It would solve any -- even though that gate  
19 station is capable of warming, if it's only flowing 130  
20 and it gets a rupture --

21           A. It would prevent a loss of service.

22           Q. Okay. Finally, Mr. Russell asked you about  
23 instances where you didn't model necessarily each  
24 possible shortfall less than a hundred and fifty  
25 decatherms at any of the gate stations. But I want you

1 to assume you have a resource that, all other things  
2 being equal, one resource can flow a hundred and thirty  
3 and one resource can flow a hundred and fifty, and just  
4 assume the price is the same, cost is the same. Is  
5 there any reason why you wouldn't select the one that  
6 chooses -- that provides 150?

7 A. I would always choose the more reliable and  
8 more capable piece of equipment. If it were my money, I  
9 would always choose the better option, which would be  
10 the one that covers more scenarios.

11 Q. In your mind, it's better because you could  
12 flow more and cover potentially more scenarios?

13 A. Correct. So, more volume is more capability.

14 Q. Okay. Thank you. No further questions.

15 COMMISSIONER LEVAR: Thank you. Any  
16 recross from the division?

17 MR. JETTER: I just have a brief follow-up  
18 to the questions they've asked -- your counsel just  
19 asked you.

20 RECROSS-EXAMINATION

21 BY MR. JETTER:

22 Q. Let's just take a hypothetical that fits July,  
23 a very low customer demand, and you have a gate outage  
24 or partial outage of 150 decatherms.

25 A. 150 decatherms.

1 Q. 150,000 decatherms. I'm not sure you can  
2 measure 150. Would you anticipate in that scenario --  
3 and maybe this is not the right question -- but would  
4 you anticipate -- we know there's a cost, but I don't  
5 know necessarily the cost exactly, specifically -- but  
6 the cost to liquefy and vaporize adds a certain amount  
7 to the cost of the decatherm. That's correct, right?

8 A. The way I understand it, all options at cost,  
9 yes.

10 Q. And so would you anticipate that the company  
11 would purchase available market gas if that gas is  
12 available at a lower cost?

13 A. I don't work in gas supply, so I don't pretend  
14 to know how they would purchase gas.

15 Q. Okay. That's probably a question for someone  
16 else. Thank you.

17 COMMISSIONER LEVAR: Okay. Thank you.  
18 Mr. Snarr?

19 MR. SNARR: I have no additional questions.

20 COMMISSIONER LEVAR: Mr. Russell, any  
21 recross?

22 MR. RUSSELL: No. Thank you, Mr. Chairman.

23 COMMISSIONER LEVAR: Commissioner Clark,  
24 any questions?

25 COMMISSIONER CLARK: There's one that I

1 would like to ask now and then I might have some  
2 questions after Mr. Gill testifies. And I'm just  
3 wondering if he'll be here tomorrow.

4 A. I'm planning on it. This is the place to be.

5 COMMISSIONER CLARK: We agree with that.  
6 In discussing historical conditions of severe weather,  
7 whether it be a design peak day or something like that,  
8 and the absence of the outages in the history that we're  
9 -- that you're anticipating in the future and that we're  
10 addressing in this docket -- one of the -- I think I  
11 heard you say that one contributing factor to the  
12 additional risk that you perceive is lack of cooperation  
13 that used to exist. I assume you meant between  
14 suppliers and the pipelines and the distribution  
15 companies. But I want to know what you meant by it.

16 A. So, I've heard Tina Faust testify before, and  
17 she's mentioned that before, I believe it's Order 636,  
18 that transportation companies and distribution companies  
19 could operate as one. So it's not that there's a lack  
20 of cooperation or discussion, it's that, legally, that  
21 type of -- those type of actions cannot take place  
22 anymore.

23 COMMISSIONER CLARK: I see what you mean.  
24 Thank you. And that concludes my questioning for today.  
25 Thank you.



1 COMMISSIONER WHITE: I have no questions.

2 Thank you.

3 COMMISSIONER LEVAR: And I don't have  
4 others. Thank you. We appreciate your testimony today.

5 A. Thank you.

6 COMMISSIONER LEVAR: And we obviously don't  
7 have time to complete Mr. Gill, but does it make sense  
8 to get his summary in before we adjourn today or would  
9 we rather just start fresh tomorrow? I don't think we  
10 have a preference one way or the other.

11 MR. SABIN: If it's all the same to you,  
12 I'd just as soon start fresh. I think we'd all just be  
13 a little fresher.

14 COMMISSIONER LEVAR: If anyone in the room  
15 feels differently, let me know. Otherwise we're in  
16 recess until nine --

17 MR. JETTER: Can I address that?

18 COMMISSIONER LEVAR: Yes.

19 MR. JETTER: I'd like speak to the --  
20 tomorrow, Trish will represent the division, attend for  
21 the division.

22 COMMISSIONER LEVAR: Certainly. You don't  
23 need our approval to do that but we'll expect that  
24 tomorrow.

25 MR. JETTER: Thank you.

1 COMMISSIONER LEVAR: We're in recess until

2 nine a.m. tomorrow. Thank you.

3 (The commission hearing was recessed at 4:51 p.m.)

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C E R T I F I C A T E

STATE OF UTAH                    )  
  :ss  
COUNTY OF SALT LAKE         )

THIS IS TO CERTIFY that the PSC hearing named was taken before Rashell Garcia and Karen Christensen, Certified Shorthand Reporters and Notaries Public in and for the State of Utah, residing in Salt Lake City.

That the said witnesses were, before examination, duly sworn to testify the truth, the whole truth, and nothing but the truth in said cause.

That the testimony in the above-named hearing was reported in Stenotype, and thereafter caused to be transcribed into typewriting, and that a full, true, and correct transcription of said testimony so taken and transcribed is set forth in the foregoing pages, numbered from 5 to 273, inclusive.

We further certify that we are not of kin or otherwise associated with any of the parties to said cause of action, and that we are not interested in the event thereof.



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