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

Attorney for Dominion Energy Utah

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE
INFORMATIONAL FILING OF
DOMINION ENERGY UTAH
CONCERNING THE TRANSPONDER
REPLACEMENT PROGRAM AND
REQUEST FOR A WAIVER OF
APPLICABLE COMMISSION RULES

Docket No. 19-057-25

MOTION TO EXTEND THE DEADLINE FOR COMPLETING THE TRANSPONDER REPLACEMENT PROGRAM

Pursuant to the Utah Public Service Commission's (Commission) Order Approving Settlement Stipulation in Docket No. 19-057-25 (Order), Questar Gas Company dba Dominion Energy Utah (Dominion Energy or Company) respectfully moves the Commission for an extension of the deadline for completing the Transponder Replacement Program (Motion).

In 2015, the Company discovered that its Elster transponders were failing at an unusually high rate. Upon investigation, the Company discovered that the batteries in the transponders had a much shorter life than represented by Elster. The Company determined that it needed to replace the Elster transponders with Itron transponders.

On October 1, 2019, the Company filed an Informational Filing and Request for Waiver of Commission Rules. On November 14, 2019, the Company, the Utah Division of Public Utilities (Division), and the Utah Office of Consumer Services (Office) filed a Settlement Stipulation which provided, among other things, that the Commission would temporarily waive the provisions of Utah Admin. Code § R746-200-4(B) and R746-320-A(A)-(C) until October 1, 2020. The Settlement Stipulation also provided that the Company would complete its transponder replacement program by October 1, 2020 and that "[s]hould the Company need to extend this deadline, it must apply to the Commission for permission to do so." Settlement Stipulation at ¶6. In accordance with the Settlement Stipulation and the Order, the Company respectfully moves the Commission for an extension of the deadline for completing the transponder replacement program.

Since the issuance of the Order, the Company has been diligently replacing transponders. The Company has over 1.1 million transponders on its system and as of the end of October 2020, only 3,644 Elster transponders remain that need to be replaced. These remaining transponders are either inaccessible or require more complicated work by a different crew. The Company has put forth significant effort to reach those customers with inaccessible meters and to gain access to the meters including making telephone calls, knocking on customers' doors, and leaving post cards indicating that customers must make an appointment to have the transponder replaced. Despite these efforts, the Company has not been able to make contact with all of those customers to have the transponders replaced.

Importantly, many these inaccessible transponders are still functioning properly and have not necessitated manual reading. Of the remaining 3,644 meters, about 1,700 require manual meter reading. The Company is not estimating any customer bills for more than six months and is now

in compliance with Utah Admin. Code R 746-200-4(B) and the applicable provisions in its Utah Natural Gas Tariff No. 500. The Company does not request an extension of the waiver previously issued in this docket.

Notwithstanding the progress made thus far, the Company has not completed the transponder replacement program this year and therefore seeks Commission approval to extend the deadline for completing the program. The Company believes it can have all transponders replaced, including those transponders requiring more complex work, by March 31, 2021.

The Company notes that, given that this group of customers has proven unresponsive to the Company's efforts thus far. Therefore, Dominion Energy may seek Commission approval in the future for additional measures to ensure that these customers grant access to the Company for transponder replacements. The Company also recognizes that the continuing Covid-19 pandemic may have an impact on the Company's ability to access meters inside structures, or a customer's willingness to grant the Company access. In some instances this may further delay the replacement of some of these transponders that are in confined indoor spaces. The Company has protocols in place that it will follow to ensure that replacements are done in a manner that is safe for both employees and customers.

THEREFORE, Dominion Energy respectfully moves the Commission for an Order extending the deadline for completing the transponder replacement program until March 31, 2021, as more fully discussed above.

RESPECTFULLY SUBMITTED this 19th day of November, 2020.

DOMINION ENERGY UTAH

enniffer Nelson Clark

Attorney for Dominion Energy Utah

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing MOTION TO EXTEND THE DEADLINE FOR COMPLETING THE TRANSPONDER REPLACEMENT PROGRAM was served upon the following persons by e-mail on November 19, 2020.

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

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

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

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

/s/ Ginger Johnson