

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

Cameron L. Sabin (9437)  
Stoel Rives LLP  
201 South Main Street, Suite 1100  
Salt Lake City, UT 84111  
Phone: (801) 578-6985  
Fax: (801) 578-6999  
[Cameron.sabon@stoel.com](mailto:Cameron.sabon@stoel.com)

*Attorneys for Dominion Energy Utah*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF DOMINION ENERGY UTAH FOR APPROVAL OF A NATURAL GAS CLEAN AIR PROJECT AND FUNDING FOR THE INTERMOUNTAIN INDUSTRIAL ASSESSMENT CENTER	Docket No. 19-057-33  MOTION FOR LEAVE TO AMEND THE APPLICATION
---	--

Questar Gas Company dba Dominion Energy Utah (Dominion Energy or Company) respectfully moves the Utah Public Service Commission (Commission) for leave to amend its application and accompanying testimony in the above-referenced matter. The Company brings this Motion on the following grounds:

On December 31, 2019, Dominion Energy filed an Application in this matter seeking Commission approval (1) the Natural Gas Clean Air Program described therein; (2) for funding the Intermountain Industrial Assessment Center (IIAC) at the University of Utah; and (3) for the implementation of a balancing account to track the costs associated with both.

On February 14, 2020, the Office of Consumer Services (Office) filed a Motion to Dismiss Application or, in the Alternative, Motion for Summary Judgment Denying Application (Motion to Dismiss). In its Motion, the Office argued, among other things, that the information in the Application related to the proposed CHP lacked sufficient specificity to meet applicable statutory requirements.

The Company recognizes that greater specificity and a more thorough analysis related to the CHP project described in the Application are desirable. It therefore requests leave to amend the Application and accompanying exhibits to remove information pertaining to that project, as well as a request for approval for such project. The Company will conduct further analysis and may file a new application seeking Commission consideration of the CHP project at a later date.

The Company has attached as Exhibit A the Amended Application and accompanying exhibits to remove reference to the CHP project.<sup>1</sup> The Amended Application and accompanying exhibits do not offer any new or additional evidence in support of the Amended Application, nor do they reflect any change in legal positioning not previously advanced in this docket. Therefore, this Motion will not result in any undue prejudice to any party or any need to alter the current schedule.

---

<sup>1</sup> The Company will provide a red-lined copy of the Amended Application and accompanying exhibits showing all of the changes from the originally-filed documents to the Commission or any party, upon request.

Based upon the foregoing, the Company respectfully requests that the Commission grant it leave to amend its Application to withdraw its request for approval of the CHP project at this time as more fully set forth herein.

Respectfully submitted,

/s/ Jennifer Clark  
Jennifer Clark (7947)  
Dominion Energy Utah  
333 S. State Street  
PO Box 45433  
Salt Lake City, Utah 84145-0433  
(801) 324-5392  
Jennifer.clark@dominionenergy.com

Cameron L. Sabin (9437)  
Stoel Rives LLP  
201 S. Main Street, Suite 1100  
Salt Lake City, Utah 84111  
(801) 328-3131  
Cameron.sabin@stoel.com

*Attorneys for Dominion Energy Utah*

## CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Motion for Leave to Amend the Application was served upon the following persons by e-mail on June 12, 2020:

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

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

Robert J. Moore  
Victor Copeland  
Assistant Attorney General  
160 East 300 South  
P.O. Box 140857  
Salt Lake City, UT 84114-0857  
rmoore@agutah.gov  
vcopeland@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

Phillip J. Russell  
HATCH JAMES & DODGE, PC  
10 West Broadway, Suite 400  
Salt Lake City, Utah 84101  
[prussell@hjdllaw.com](mailto:prussell@hjdllaw.com)  
Counsel for the Utah Association of Energy Users

Jacob A. McDermott  
Rocky Mountain Power  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
[Jacob.mcdermott@pacificorp.com](mailto:Jacob.mcdermott@pacificorp.com)  
Counsel for Rocky Mountain Power

Jana Saba  
Rocky Mountain Power  
1407 West North Temple, Suite 330  
Salt Lake City, Utah 84116  
[jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)

/s/ Ginger Johnson \_\_\_\_\_