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*Attorney for Questar Gas Company
dba Dominion Energy Utah*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE FORMAL COMPLAINT OF D. LYNN CONGER AND MICHAEL PAUL ADAMS AGAINST DOMINION ENERGY UTAH	Docket No. 20-057-03 DOMINION ENERGY’S RESPONSE
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Respondent, Questar Gas Company dba Dominion Energy Utah (“Dominion Energy” or “Company”), respectfully responds to the *Complaint of D. Lynn Conger and Michael Paul Adams Against Dominion Energy Utah* as follows:

RESPONSE TO COMPLAINT

1. D. Lynn Conger and Michael Paul Adams (“Complainants”) have raised one primary issue in their Complaint—that the Company has been estimating bills instead of providing billing based upon actual reads.¹ The Company has had difficulty obtaining meter reads at Complainants’ Residence (defined below) for more than a decade.

¹ Complainants also indicated offense that Elia Lopez, a Customer Relations Specialist for the Company, provided them with information about agencies that would be able to help customers on fixed incomes with utility bills. The Complainants note that this information “has no bearing on our informal Complaint and is also Irrelevant, Immaterial, and has no bearing on any point of this Action.” Complaint at p. 2. Ms. Lopez sent the referenced information because Complainants’ informal Complaint indicated that they “cannot afford to catch up when Dominion Energy does not read their meter.” See Exhibit A to the Complaint. The Company meant no offense, but simply intended to address one concern contained in the informal complaint.

2. On March 10, 2006, Complainants contacted Dominion Energy complaining that the transponder attached to the natural gas meter at the property located at 3153 S. 4400 W., West Valley City, Utah (“Complainants Residence”) was interfering with Complainants’ television reception. Complainants requested that the transponder be removed. Company personnel removed the transponder that same day, intending to make manual meter reads.

3. From 2006 through 2017, Company personnel manually read Complainant’s meter. The yard at Complainants residence is fenced and Complainants’ dogs are free within the fenced yard. Complainants often refused to permit Company personnel entry to the yard for purposes of meter reading. In fact, Mr. Adams has indicated to Company personnel that his dogs are trained to attack and that they will attack Company personnel should they enter the yard. Until 2018, Company personnel were able to obtain a manual meter read by entering a neighbor’s fenced yard and looking over the fence into Complainant’s yard in order to see the meter.

4. In February of 2018, Complainants’ neighbor asked Company personnel to stop accessing their yard for purposes of reading the meter at Complainants’ Residence. The neighbor indicated that they had done landscaping that they did not want damaged, and that the Company’s requests for access the neighbor’s fenced yard was inconvenient.

5. Accordingly, Company spoke with Complainants about a installing a new transponder on the meter at Complainants’ Residence. Complainants refused to permit Company to install a transponder and have continued to prevent access to the meter for manual reads. For the next year, Company billed Complainants based upon periodic estimates, and periodic manual reads. Those less-frequent manual reads were usually obtained from the neighbor’s yard but, on one occasion, billing was based upon Complainant’s reported read as described below.

6. DEU Confidential Exhibit 1 is an account itemization showing Complainants billing from April of 2019 to January of 2020. It also reflects which months the Company relied on estimates for billing and which months the Company conducted a manual meter read. In the third column of the table, the letter “E” represents a bill for estimated usage and an “R” represents a bill based upon a manual meter read. Notably, in January of 2020, Complainants contacted the Company, complaining about estimated meter reads and, at the Company’s prompting, took a photo of the meter. The Company utilized that photo to correct Complainants’ bill.

7. On February 28, 2020, a Company representative spoke to Complainants and offered to install a new transponder at an agreed-upon time, in order to test the transponder to ensure that it did not interfere with Complainants’ television reception. Complainants agreed to this course of action. On March 12, 2020, a Company representative went to Complainants Residence and installed a transponder. Upon making such installation, Company personnel remained at Complainants’ Residence until Complainants were satisfied that the transponder did not interfere with their television. Company expects that the new transponder will provide regular meter reads and therefore eliminate going-forward concerns about estimated bills.

8. Utah Admin. Code § R746-200-4(1) provides that “[a] gas ... public utility using an estimated billing procedure shall try to make an actual meter reading at least once in a two-month period and give a bill for the appropriate charge determined from that reading.”

9. Company has made every effort to read Complainants’ meter, including direct contact with Complainants and contact with Complainant’s neighbors. It has only utilized estimates when its efforts to obtain access to the meter for a manual read were unsuccessful. Moreover, the Company worked with Complainants to install a new transponder that does not

interfere with Complainants' television reception, and the Company expects that it will be able to obtain accurate meter reads remotely going forward.

10. Utah Admin. Code § R746-200-7(C)(1)(f) provides that "Residential utility service may be terminated for the following reasons: . . . (f) Failure to provide access to meter during the regular route visit to the premises following proper notification and opportunity to make arrangements in accordance with R746-200-4(B)" Complainants have failed to provide the Company with access to its meter during regular route visits, despite repeated notification that access is necessary in order to obtain a manual meter read.

11. Company personnel have made multiple attempts over the years to obtain meter reads at Complainants' Residence and Complainants have refused to permit access for meter reading. Company personnel have taken all reasonable steps to obtain regular manual meter reads at Complainants' Residence but are only successful some of the time. When the Company is unsuccessful in obtaining a manual meter read, it estimates Complainants' usage for purposes of billing, in accordance with applicable statutes, rules and regulations. Company has, and continues, to work with Complainants to address their concerns about transponders, and to obtain accurate meter reads for purposes of billing.

12. The Company has complied with all laws, statutes, rules, regulations and tariff provisions. Therefore, the Company respectfully requests that the Commission find in its favor and deny further relief to Complainants.

DATED: March 19, 2020.

/s/Jennifer Nelson Clark
Jennifer Nelson Clark
Questar Gas Company dba Dominion Energy Utah
Attorney for Dominion Energy Utah

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **DOMINION ENERGY'S RESPONSE** was served by email upon the following as set forth below on March 19, 2020:

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/s/Leora Abell
