

Jennifer Nelson Clark (7947)  
Dominion Energy Utah  
333 South State Street  
P.O. Box 45360  
Salt Lake City, Utah 84145  
(801) 324-5392  
(801) 324-5395 (fax)  
*Jennifer.Clark@dominionenergy.com*

*Attorney for Questar Gas Company  
dba Dominion Energy Utah*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

IN THE MATTER OF THE FORMAL COMPLAINT OF MICHAEL LYONS AGAINST DOMINION ENERGY UTAH	Docket No. 20-057-09  <b>DOMINION ENERGY’S RESPONSE TO COMPLAINT OF MICHAEL LYONS</b>
---	---

Respondent, Questar Gas Company dba Dominion Energy Utah (“Dominion Energy” or “Company”), respectfully responds to the *Complaint of Michael Lyons Against Dominion Energy Utah* (“Complaint”) and the allegations of Michael Lyons (“Complainant”) as follows:

**RESPONSE TO COMPLAINT**

1. Complainant raises one primary issue in his Complaint—that the Company charges a Basic Service Fee (BSF) during Temporary Discontinuance of Service.
2. Complainant began receiving service at his residence in St. George, Utah on August 13, 2019. Complainant terminated natural gas service at his residence on April 30, 2020. Complainant has indicated in both his Informal Complaint and his Formal Complaint that he takes natural gas service at his home in St. George only for heating purposes during the coldest six months of the year, and that he chooses not to receive natural gas service during the warmest six

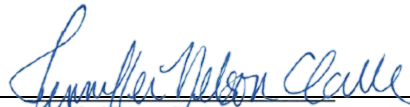
months of the year when heating is unnecessary. Complainant objects to paying a Basic Service Fee during his Temporary Discontinuance of Service.

3. Section 8.03 of Dominion Energy Utah's Natural Gas Tariff PSCU 500 ("Tariff") provides that "[c]ustomers taking service on rates schedules GS, FS, TBF, MT, TS and IS will be billed an annual BSF on a monthly basis for each meter installed ... [and] will be required to pay the BSF for each month during a temporary discontinuance of service." Section 11 of the Tariff defines a *Temporary Discontinuance of Service* as "[d]iscontinuance of service for any reason lasting less than twelve months." Section 11 of the Tariff further provides "[s]ervice to a customer who discontinues service and who applies for resumption of service within twelve months at the same location will be deemed to be a temporary discontinuance of service." Complainant's discontinuance of service during six months of the year is plainly a Temporary Discontinuance of Service under the Tariff and as a result, Complainant is required to pay a Basic Service Fee during that time.

4. Based upon the foregoing, it is clear that the Company has complied with all applicable statutes, rules, regulations, Tariff provisions and Commission Orders and, therefore, the Complaint in this matter should be denied.

Therefore, Dominion Energy respectfully requests that the Commission deny the formal complaint of Michael Lyons.

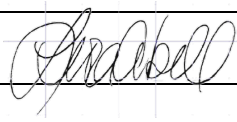
DATED: May 13, 2020.

  
\_\_\_\_\_  
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 May 13, 2020:

Patricia E. Schmid Justin C. Jetter Assistant Attorneys General 160 E. 300 South P.O. Box 140857 Salt Lake City, UT 84114-0857 <a href="mailto:pscmid@agutah.gov">pscmid@agutah.gov</a> <a href="mailto:jjetter@agutah.gov">jjetter@agutah.gov</a> Counsel for the Division of Public Utilities	Chris Parker William Powell Utah Division of Public Utilities 160 E. 300 South P.O. Box 146751 Salt Lake City, UT 84114-6751 <a href="mailto:chrisparker@utah.gov">chrisparker@utah.gov</a> <a href="mailto:wpowell@utah.gov">wpowell@utah.gov</a>
Robert J. Moore Victor Copeland Assistant Attorneys General 160 E. 300 South P.O. Box 140857 <a href="mailto:rmoore@agutah.gov">rmoore@agutah.gov</a> <a href="mailto:vcopeland@agutah.gov">vcopeland@agutah.gov</a> Counsel for the Office of Consumer Services	Michele Beck Director Office of Consumer Services 160 E. 300 South P.O. Box 146782 Salt Lake City, UT 84114-6782 <a href="mailto:mbeck@utah.gov">mbeck@utah.gov</a>
Michael Lyons 2771 Tonaquint Drive St. George, UT 84797 E-mail: mountainlyons1@gmail.com	

  
\_\_\_\_\_