

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

*Attorney for Dominion Energy Utah*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

FORMAL COMPLAINT OF JOHN KEVIN PARSONS AGAINST DOMINION ENERGY UTAH	Docket No. 21-057-03  DOMINION ENERGY UTAH'S REDACTED WRITTEN RESPONSE TO COMPLAINT
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Pursuant to the Utah Public Service Commission's (Commission) Notice of Filing and Comment Period issued on March 2, 2021 in this docket, Questar Gas Company dba Dominion Energy Utah (Dominion Energy or Company) respectfully submits this written response.

**DOMINION ENERGY'S RESPONSE**

On February 23, 2021, Dominion Energy sent Mr. Parsons a Service Line Agreement (the Agreement). A copy of the Agreement is attached as DEU Exhibit A. The Agreement provides that the Company will place a service line and meter at a residence under construction at 259 Big Matter Horn Way, Midway, UT 84049 (the Residence), in accordance with the Company's Utah Natural Gas Tariff No. 500 (Tariff). The Agreement indicates that the meter will be placed on the west side of the home behind the stairway. Mr. Parsons has not signed or returned the Agreement.

The Residence is located on a steep hillside in an area that receives significant snowfall every year. Accordingly, Dominion Energy selected a meter location that would be accessible for both maintenance and in the event of an emergency, and that also protected the meter from accumulating excessive snow and ice. Photos of the Residence are attached hereto as DEU Exhibit B. Pages 1 and 2 of DEU Exhibit B show an overhead view of the development where the Residence is located and illustrates the hillside upon which the Residence is being constructed. Drawings of the Residence are attached hereto as DEU Exhibit C.

The Company initially selected a meter location shown on DEU Exhibit B, page 3 and DEU Exhibit C. This location was deemed appropriate because it protected the meter from snow and ice and is accessible to DEU for purposes of maintenance or in case of emergency. Mr. Parsons did not want the meter placed at that location because it was unsightly and located near a window. Instead, Mr. Parsons requested that the meter be placed on the side of the house opposite the road and driveway, and at the bottom of a steep slope. Mr. Parsons' preferred location is shown with a star on DEU Exhibit B, page 3 and with a red star on DEU Exhibit C. DEU evaluated the requested area and deemed that it was unsafe for multiple reasons, including that the meter was at the bottom of a steep slope and Mr. Parsons' preferred location is also unprotected from snowfall, as the roof is two stories up and has an inadequate overhang to offer adequate protection. A meter in that location is also vulnerable to snow accumulating on and around the meter. The requested location would also be difficult to access for maintenance and in the event of an emergency. Page 4 of DEU Exhibit B illustrates the risk.

The Company and Mr. Parsons discussed placing the meter in alternate locations including the locations described in DEU Exhibit B, pages 5-10. Locations adjacent to the

garage were unsafe because of the risk of impact by a vehicle. Locating the meter under a landing of the exterior staircase would be inaccessible to Company personnel and was, therefore, not acceptable to the Company. The Company reviewed two other locations on the northeast corner of the structure, but both were unacceptable because of space and inaccessibility concerns. The Company believes that the best location for the meter would be on the side of the landing of the exterior staircase as indicated on DEU Exhibit B.

Section 8.01 of the Tariff provides “The Company will determine the place for setting or resetting the meter.” Section 8 of the Company’s Standard Practice Designing Distribution Meter Sets SP 1-40-01 requires that [REDACTED]

[REDACTED]

[REDACTED]” Section 9.3 of Standard Practice 1-40-01 identifies Midway as a heavy snowfall area. A copy of the referenced sections of the Standard Practice 1-40-01 are attached hereto as DEU Confidential Exhibit D.

The Company selected the safest location for the meter at the Residence in accordance with the Tariff and its own Standard Practices.

Mr. Parsons also expresses concern about the costs associated with his service line. He acknowledges that the Company only seeks to charge him the current costs associated with that installation.

Section 9.04 of the Tariff provides that “A cash contribution in aid of construction will be required from the applicant, in advance of construction. The cash contribution shall be equal to the sum of the total Service Line Costs.” “Service Line Costs” are

defined to include pipe, trenching, fill, riser, and other construction-related costs. Tariff Section 9.04. DEU Exhibit A shows that the Company simply required Mr. Parsons to pay appropriate Service Line Costs, no more no less, in accordance with the Tariff.

Dominion Energy has, at all times, acted in accordance with all applicable statutes, rules, regulations, Commission orders, and Tariff provisions. It has charged Mr. Parsons' for certain costs, as required by Section 9.04 of the Tariff. It selected the safest meter location according to the requirements set forth in its Standard Practices. Accordingly, Mr. Parsons' Complaint should be denied.

RESPECTFULLY SUBMITTED this 31<sup>st</sup> day of March, 2021.

DOMINION ENERGY UTAH

/s/ Jenniffer Nelson Clark  
Jenniffer Nelson Clark  
*Attorney for Dominion Energy Utah*

## CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the Application was served upon  
the following persons by e-mail on March 31, 2021:

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

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

Robert J. Moore  
Assistant Attorney 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

John Kevin Parsons  
259 Matterhorn Way  
Midway, UT 84049  
kevinparson1@gmail.com

/s/ Shalise McKinlay \_\_\_\_\_