

IN THE MATTER OF THE)	
APPLICATION OF DOMINION)	
ENERGY UTAH FOR APPROVAL OF)	Docket No. 17-057-T04
A THIRD-PARTY BILLING RATE)	
)	MOTION TO RECONSIDER

The Rocky Mountain Gas Association (RMGA) respectfully requests that the Utah Public Service Commission reconsider this Third-Party Billing Rate tariff that was approved on July 28, 2017, because RMGA who represents non-union residential HVAC and Plumbing contractors believes the Commission erred in allowing a third-party tariff for HVAC and Plumbing contractor warranty programs to be billed on Dominion Energy ratepayer gas bills.

DISCUSSION

RMGA believes this tariff is adverse to public interest and good, because it provides Dominion Energy Solutions, a for-profit subsidiary of Dominion Energy with an unfair advantage over all other for-profit HVAC and Plumbing contractors who offer home warranty programs, and natural gas furnace and water heater repair work in Utah. We argue that while Utah Code 54-4-37, deals with third party billing, it does not address the issue of customer confusion and whether gas utility ratepayers will understand that they are not contracting directly with Dominion Energy, Utah’s only natural gas provider. Ratepayers will be unaware that they are instead contracting with a for-profit subsidiary that competes directly will all other independent HVAC and Plumbing contractors in Utah, who may also offer warranty programs

and/or goods and services that may be less expensive or a better option for HVAC and plumbing service to Utah's natural gas customers, thus harming the ratepayers.

RMGA also refutes the discussion and findings in the docket, that there is not a readily discernible market for warranty programs in Utah, and that the proposed tariff would not negatively impact customers in a manner unrelated to their rates. As already stated, there will be confusion among ratepayers, who will believe that they are contracting for a warranty service with Dominion Energy, not their for-profit subsidiary, Dominion Energy Solutions, which has plans to further blur the line between the ratepayer based entity and the for-profit subsidiary, by advertising the warranty programs in Dominion Energy newsletters that are sent out regularly along with ratepayer gas bills, a prospect that small HVAC and Plumbing contractors may not be able to accomplish because of the cost and ability to provide mechanical services in Dominion Energy's entire service area.

RMGA only today found out about this Third-Party Billing Rate tariff application and that today is also the deadline for filing a motion to reconsider this matter, otherwise, we would have appeared at the initial hearing and objected at that time. RMGA has also reached out to other contractor associations and discovered that RMGA is not alone among sub-contractor associations concerned with the unfair advantage over all other HVAC and Plumbing contractors of Utah, by allowing Dominion Energy Solutions warranty program to be billed on Dominion Energy ratepayer gas bills. Had today not been the last day to file a motion to reconsider, additional parties would have supplemented and signed on to this motion as interested parties.

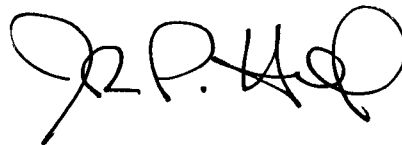
WHEREFORE, RMGA respectfully requests that the Commission:

- 1) Rescind the approval of Docket No. 17-057-T04.
- 2) Have the Public Service Commission reconsider the public impact of third party billing services offered by Dominion Energy that would allow their for-profit subsidiary: Dominion Energy Solutions, an unfair competitive advantage over all other private warranty service providers, HVAC and Plumbing Contractors licensed to work in Utah.
- 3) Stop any and all implementation of Dominion Energy Solutions plans to advertise and offer HVAC and Plumbing warranty programs on Dominion Energy ratepayer gas bills until this Motion to Reconsider has been reviewed by the Public Service Commission.

DATED this 28th day of August 2017.

Respectfully submitted,

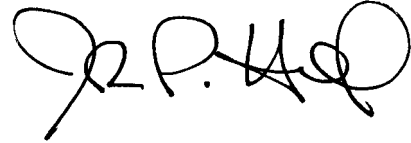
Rocky Mountain Gas Association

A handwritten signature in black ink, appearing to read "J.P. Hill", with a stylized flourish at the end.

John P Hill
Attorney for RMGA
153 S 900 E, #3
Salt Lake City, UT 84102
801-521-8340

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August 2017, a true and correct copy of the foregoing Motion to Reconsider was served upon the following by electronic mail:



Patricia E. Schmid
Justin C. Jetter
Assistant Attorneys General
160 East 300 South
PO Box 140857
Salt Lake City, UT 84114-0857
pschnid@agutah.gov
jjetter@agutah.gov

Robert J. Moore
Steve Snarr
Assistant Attorneys General
160 East 300 South
PO Box 140857
Salt Lake City, UT 84114-0857
rmoore@agutah.gov
ssnarr@agutah.gov

Michele Beck, Director
Office of Consumer Services
400 Heber M. Wells Building
160 East 300 South Salt Lake City, UT 84111
mbeck@utah.gov

Chris Parker
Division of Public Utilities
400 Heber M. Wells Building
160 East 300 South Salt Lake City, UT 84111
chrisparker@utah.gov

Jenniffer Nelson Clark
Attorney for Dominion Energy
333 S. State Street
P.O. Box 45433
Salt Lake City, Utah 84145-0433
(801) 324-5392
jenniffer.clark@dominionenergy.com