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dba Dominion Energy Utah*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

IN THE MATTER OF THE REQUEST OF  
DOMINION ENERGY UTAH FOR  
APPROVAL OF A VOLUNTARY  
RESOURCE DECISION TO CONSTRUCT  
AN LNG FACILITY

Docket No. 18-057-03

**SUPPLEMENTATION TO  
MOTION TO MODIFY  
SCHEDULING ORDER**

Questar Gas Company dba Dominion Energy Utah (“Company” or “Dominion Energy”) hereby supplements its Motion to Modify Scheduling Order (“Motion”), in response to the Notice issued by the Commission on September 24, 2018. In the Notice, the Commission indicated that it could consider the Company’s Motion if the Company supplemented its Motion to provide the following information:

- (1) the specific facts or arguments raised in written surrebuttal that DEU alleges it must respond to with additional live testimony;

(2) the extent to which those facts or arguments are responsive to DEU's rebuttal testimony; and

(3) the impact of those facts and testimony on the adequacy of DEU's original application.

(Notice at 1.) The Company addresses each of these issues below.

First, the following facts, issues and argument (collectively, the "Matters") were raised in surrebuttal testimony of other parties for the first time. For that reason, the Company did not have the opportunity to respond to the Matters in its rebuttal testimony:

(A) Magnum Energy has offered the surrebuttal testimony of David Schultz. Mr. Schultz did not provide any direct testimony in this matter, and his surrebuttal testimony, in its entirety, presents newly-asserted Matters. Specifically, he:

(1) compares underground storage facilities to LNG facilities, including discussing alleged regulatory oversight applicable to each type of facility, the permitting processes for each type of facility, federal and state standards relating to the facilities, facility operating procedures, and safety requirements (Schultz Surrebuttal at 3-7);

(2) asserts that there is a risk of obsolescence with LNG facilities (*id.* at 8);

(3) discusses the alleged risk of urban encroachment on LNG facilities (*id.* at 9-10);

(4) offers a comparison of the relative complexity of operating underground storage facilities constructed in salt domes versus operating an LNG facility (*id.* at 11-13);

(5) discusses the asserted relative capital operating costs of underground storage facilities versus LNG facilities (*id.* at 13-15);

(6) discusses the asserted operating flexibility and reliability of underground storage facilities versus LNG facilities (*id.* at 15-17); and

(7) asserts that most natural gas companies when faced with a need, choose storage over LNG facilities (*id.* at 18-19).

(B) Mr. Holder advocates for a specific definition of on-system versus off-system by citing to information from another LDC and the U.S. Energy Information Administration.

(Holder Surrebuttal at 10-12.)

(C) Mr. Mierzwa makes the following claim in his surrebuttal testimony:

“[I]t is likely that none of the 45 percent of LDCs with LNG facilities included in the AGA survey utilize their LNG facility solely as a back-up gas supply resource to address design day supply shortfalls as DEU is proposing in this proceeding.

DEU has not identified any LDCs that currently utilize their on-system LNG facility solely as a back-up gas supply resource. I found the 45 percent statistic not to be a relevant statistic for this proceeding primarily because based on the evidence presented in this proceeding, none of the LDCs identified in the AGA survey with LNG facilities use that facility solely as a back-up gas supply resource as DEU proposes in this proceeding. The evidence presented in this proceeding indicates that the 45 percent of LDCs identified in the AGA survey use LNG facilities as both a gas supply and capacity resource.” (Mierzwa Surrebuttal at 11-12.)

None of these Matters was presented in these or other witnesses’ direct testimony. As such, the Company did not have the opportunity to address any of these Matters.

Second, while these witnesses claim that their newly-asserted Matters are in response to

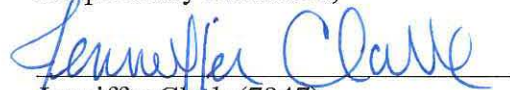
the Company's rebuttal testimony, all of those Matters could have been presented in intervenor direct testimony, but were not. They all relate to issues raised in the Company's direct testimony.

Third, there is no clear way to estimate what impact, if any, that these Matters may or will have on the adequacy of the Company's application. From the Company's perspective, it believes these witnesses' surrebuttal testimony is incorrect and unsupported. For that reason, the Company does not believe the Matters should have any impact on this proceeding. However, because the Company cannot anticipate what others may think of these Matters, the Company respectfully submits that it should be entitled to address these newly-asserted Matters.

Therefore, the Company respectfully moves the Commission to amend the Scheduling Order to allow the Company to address surrebuttal issues during the live testimony offered by its witnesses at the hearing.

DATED this 27<sup>th</sup> day of September, 2018.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing **SUPPLEMENTATION TO MOTION TO MODIFY SCHEDULING ORDER** was served upon the following persons by email on September 27, 2018:

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