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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Investigation of Dominion Energy's Gas Line Coverage Letter	Docket No. 18-057-07  DOMINION ENERGY UTAH'S SUBMISSION OF PROPOSED PLAN FOR UNWINDING BILLING ARRANGEMENTS
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Pursuant to the Guidance to Parties In Preparation for the May 24, 2018 Scheduling Conference issued by the Utah Public Service Commission (Commission) on May 23, 2018 (Guidance) and the Scheduling Order and Notice of Technical Conference issued by the Commission on May 25, 2018 (Scheduling Order), Questar Gas Company dba Dominion Energy Utah (Dominion Energy Utah or Company) respectfully submits this Proposed Plan for Unwinding Billing Arrangements.

In its Guidance, the Commission directed the Company to "immediately prepare and file in this docket a plan for unwinding the billing arrangement for those customers in the event we ultimately suspend or revoke the tariff language that authorizes DEU to

engage in third-party billing.” (Guidance at p. 4.) In response to that direction, Dominion Energy Utah provides the following proposed plan.

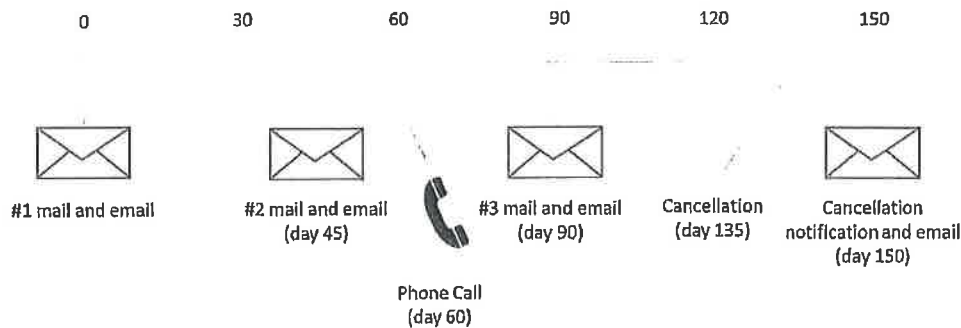
Dominion Energy Utah recognizes that the Commission desires further clarification to ensure customers are not confused from prior communications they have received regarding home repair programs from HomeServe. The Company also recognizes that the Commission may, as a result of this proceeding, choose to suspend or revoke Section 8.08 of Dominion Energy Utah’s Utah Natural Gas Tariff No. 500 (Tariff). The Company, therefore, offers two alternative plans; one to be deployed if the Commission does not suspend or revoke Section 8.08 of the Tariff, and a second to be deployed if the Commission does suspend or revoke Section 8.08.

Should the Commission leave Section 8.08 of the Tariff in place, the Company proposes that a clarifying letter be sent to those customers who have signed up for a home repair program from HomeServe USA (HomeServe). The letter is intended to ensure that those customers clearly understand the following points: (1) the coverage is optional, (2) the coverage is from HomeServe, and not Dominion Energy Utah, and (3) with respect to Gas Line Coverage, clarifying which facilities are covered by the program and which facilities are maintained by Dominion Energy Utah. The letter will also remind customers that coverage can be terminated by the customer at any time. DEU Exhibit A is the form letter.

Alternatively, should the Commission suspend or revoke Section 8.08 of the Tariff, the Company, together with Dominion Products and Services and HomeServe, recommend the deployment of the following plan for unwinding the billing arrangements, which is efficient and provides for the best customer experience given the circumstances.

We recommend communicating with customers who signed up for a home repair program using mail, email (where known) and telephone (where known) to ensure that all applicable customers are notified. For customers that are currently being billed on the Dominion Energy Utah bill, the initial communication would notify customers of the Commission's decision and inform them that they must contact HomeServe and make alternative billing arrangements or their home repair program will be cancelled. A draft of this proposed initial letter (Initial Letter) is attached as DEU Exhibit B.

In addition to the Initial Letter, we recommend sending two additional communications via mail, over the course of 135 days, to ensure customer wishes are clearly understood and that customers know the steps they must take to maintain the home repair program. These mailings would be spaced over 45 days as described in the timeline below. We advise a 45-day cycle to reduce the risk of customers being double billed – once on Dominion Energy Utah bill and then again through HomeServe. The second and third letters referenced in the timeline below would be in the form shown in DEU Exhibit C.



In addition to the letters referenced above, we propose sending, concurrent with each letter, emails to customers where possible, notifying them of the requirement to provide new billing information, should they wish to keep their coverage. The content of the emails would be very similar to the letters provided at the same time. Additionally,

approximately 60 days after the Initial Letter and as an additional outreach effort, we propose having HomeServe place a telephone call to those customers that have voluntarily provided a phone number to communicate to them the need to respond to the letters.

Finally, for those customers who have confirmed that they want to continue the home repair program, and have provided HomeServe with alternative billing arrangements, the coverage will continue and will be billed independently of the Company. For those customers who have either not confirmed their desire to continue enrolment in the program, or who have not provided alternative billing arrangements, their coverage will be cancelled within 135 days of the Initial Letter, as will be made clear in the communications delivered to customers prior to that date. We would also recommend that HomeServe notify customers of their cancellation 150 days after the Initial Letter.

RESPECTFULLY SUBMITTED this 5<sup>th</sup> day of June, 2018.

DOMINION ENERGY UTAH



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**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of Dominion Energy Utah's Proposed Plan for Unwinding Billing Arrangements was served upon the following persons by e-mail on June 5, 2018:

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