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Department of Commerce
Division of Public Utilities

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PUBLIC VERSION

ACTION REQUEST RESPONSE

To: Public Service Commission

From: Division of Public Utilities
Chris Parker, Director
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Artie Powell, Manager
Doug Wheelwright, Technical Consultant
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Date: October 23, 2018

Subject: Dominion Energy, Docket Nos.
18-057-13 - Adjustment to the Daily Transportation Imbalance Charge
18-057-14 - 191 Pass-Through Application
18-057-15 - Conservation Enabling Tariff
18-057-16 - Amortization of the Energy Efficiency Deferred Account Balance
18-057-17 - Low Income Energy Assistance Rate

RECOMMENDATION:

After a preliminary review of the applications, the Division of Public Utilities (Division) recommends the Public Service Commission of Utah (Commission) approve, on an interim basis, the requested rate changes in Docket Nos. 18-057-13 (Daily Transportation Imbalance Charge), 18-057-014 (191 Account), and 18-057-16 (Energy Efficiency) with an effective date of November 1, 2018. These requested rate changes should be approved on an interim basis in order to allow additional time for the Division to complete an audit of the individual entries in the respective accounts. The Division also recommends that the Commission approve the requested rate change in Docket Nos. 18-057-15 (Conservation Enabling Tariff) and 18-057-17 (Low Income Assistance). These two Dockets do not require an audit and do not need interim approval.

ISSUE:
On October 1, 2018, Questar Gas Company dba Dominion Energy Utah (Dominion or Company) filed the applications identified above with the Commission and the Commission subsequently issued an Action Request to the Division. This memo is the Division's response to the Action Request for all five Dockets.

Docket No. 18-057-13 – The Daily Transportation Imbalance Charge filing is a request to adjust the imbalance charge calculation approved in Docket No. 14-057-31. The transportation imbalance charge began in February 2016 and is required to be recalculated twice each year as part of the 191 pass-through filing. The revised calculation is based on updated volumes through August 2018. If approved, the proposed rate would increase from $0.07645 to the proposed rate of $0.08122. This rate applies to transportation customers with daily imbalance volumes outside the ± 5% tolerance level.

Docket No. 18-057-14 – The 191 Account Pass-Through filing asks for Commission approval to decrease the commodity rate components of the Company's Utah natural gas rates by $37.701 million and decrease the supplier non-gas cost rate components by $8.083 million for a net decrease of $45.784 million. Based on current rates, if this 191 Account decrease is approved, a typical GS residential customer using 80 Dth per year (typical GS residential customer) will see a decrease of $32.88[1] in their annual bill, which represents a decrease of 5.16%, independent of any other decrease or increase.

Docket No. 18-057-15 – The Conservation Enabling Tariff (CET) filing is a request to amortize the August 2018 over-collected balance of $9.153 million. If this CET amortization request is

[1] Exhibit 1.7, Column F, Line 13.

approved, a typical GS residential customer will see a decrease of approximately $7.43 or 1.17% in their annual bill, independent of any other decrease or increase.

Docket No. 18-057-16 – The Energy Efficiency Deferred Account Balance filing is a request to adjust the amortization rate in order to collect the 2019 budget amount of $24.545 million plus a $2.816 million under-collected balance. If this amortization rate adjustment is approved, a typical GS residential customer will see an increase of approximately $4.01 or 0.63% in their annual bill, independent of any other decrease or increase.

Docket No. 18-057-17 – The Low Income Energy Assistance filing is a request to adjust the collection rate in order to collect the approved $1.5 million minus an over collected amount of $84,808. In addition to adjusting the rate, the proposed customer credit to low income customers will increase from $72.50 to $77.00. If these changes are approved, a typical GS residential customer will see a decrease of approximately $0.06 or 0.01% in their annual bill, independent of any other decrease or increase.

If all the requested changes are approved, a typical GS customer will see a decrease of approximately $36.36 or 5.71% in their annual bill.

DOCKET NO. 18-057-13 - TRANSPORTATION IMBALANCE CHARGE

In Docket No. 14-057-31, the Commission approved a supplier non-gas charge to transportation customers for daily nomination imbalance volumes that were outside of a ±5% daily tolerance threshold. This rate applies to transportation customers that were taking service under MT, TS and FT-1 rate schedules and any amount collected under the rate is credited to GS customers through the 191 account. The rate is intended to charge transportation customers for SNG services that are being used and was implemented in part to improve the daily accuracy of the gas nomination process. The Commission order specifies that this rate must be reviewed with each pass-through docket and in the next general rate case.

The Company began to assess the imbalance charge as of February 1, 2016. This rate applies to transportation customers only if their individual daily gas nomination amount is outside the ±5% daily tolerance limit. Only customer nominations that are outside the tolerance limit are assessed this charge. The specific dollar amount that has been paid by all transportation customers is identified as a separate line item in the monthly financial information.

The proposed new rate of $0.08122 per Dth is an increase from the current rate of $0.07645 per Dth and is calculated based on the historical imbalance volumes for the previous 12 months ended August 31, 2018. The Division is continuing to review Exhibit 1.1, which includes the daily nomination and imbalance information for 848 transportation customers and includes nearly 275,000 lines of information. The accuracy of the nomination process and the impact of transportation customers on the Company's distribution system continue to be a concern in this as well as other Dockets.

While it does appear that the nominations have become more accurate since this rate was imposed, there are still a number of individual customers with gas nominations that fall outside the acceptable range and there is a large variation in the size of the customers that are using the transportation rate. In response to a data request, the Company provided additional information to include the marketing agents for each contract number.

In reviewing the information from Exhibit 1.1, the Division noted the following;

1. 80% of total transportation volume is attributed to the 75 largest customers. While these large customers account for 80% of the total volume, they represent only 55% of the total Dth outside the tolerance limit. The majority of these customers appear to be using the natural gas in a manufacturing process and are more accurate with the daily nomination process. These large customers would have the most significant impact on the distribution system if their nominations were not accurate.
2. The remaining 773 customers represent only 20% of the total volume and individually will have little impact on the system. While these smaller customers represent only 20% of the total volume, they represent 45% of the total Dth outside the tolerance limit. Smaller transportation customers appear to be using natural gas primarily for a seasonal

heating, are less accurate in the nomination process, and pay a greater portion of the imbalance rate.

3. Most of the daily nominations are made through marketing companies and not all of the marketing companies have the same challenges or are as accurate with the daily nomination process. One marketing company represents [redacted] of the total number of TS customers but has [redacted] of the total nomination volume. These smaller use transportation customers also have the majority of the Dth outside the 5% tolerance. Even though this particular marketing company manages [redacted] of the total nomination volume over the last 12 months, it's customers are responsible for [redacted] of the Dth outside the tolerance limits. It appears that having a large number of small usage customers represents a challenge for the marketing company to forecast individual customer using and accurately nominate gas on a daily basis.

The Division has reviewed the calculation and the information provided by the Company but has not completed an audit of the individual entries and the credits to the 191 account. The Division will continue to analyze the historical nominations and will make recommendations if necessary. Since credits from TS customers flow through the 191 account, the Division recommends approving the change to this rate on an interim basis until an audit of the 191 account has been completed.

Effect on TS Customers

The proposed change has the potential to impact transportation customers but the impact will not be the same for each customer. As mentioned above, this rate applies to TS customers only when their individual daily gas nominations are outside the ±5% tolerance limits. The imbalance charge may apply to some customers on a regular basis while others may occasionally be impacted, depending on the accuracy of the customer's nomination process. This rate also has a related impact on GS customers as the imbalance charge collected from TS customers is credited to the 191 account. All amounts that are collected under this rate are credited to the SNG collection amount and would likely have a minor impact on the balance of the over or under collection in the 191 account for GS customers.

The Division recommends the Commission approve the Application on an interim basis, with an effective date of November 1, 2018.

DOCKET NO. 18-057-14 COMMODITY GAS COST AND SUPPLIER NON-GAS COSTS (191 Account Semi-Annual Pass-Through)

This filing is based on projected Utah gas costs of $485.545 million[2] for the forecast test year ending October 31, 2019. The commodity portion of the gas cost represents a decrease of $37.701 million and the supplier non-gas cost portion (SNG) represents a decrease of $8.083 million for a combined net decrease of $45.784 million.[3] The projected decrease in the commodity cost is due primarily to the over-collected balance in the 191 account. The amount of the decrease in SNG cost is larger than the amount that was originally filed due to an error that was identified in the original application. The details of the decrease in the SNG rate will be discussed below.

The test-year cost of gas consists of cost-of-service gas from Wexpro, contract and market purchases and storage and transportation cost. The forecast price for cost-of-service production is $4.12 per Dth[4] compared to $4.23 per Dth[5] in the previous filing. Market and contract purchases for natural gas have increased slightly and are projected to cost $2.54 per Dth[6] compared to $2.41 per Dth[7] in the previous filing. Due to the large volume of cost of service gas from Wexpro, market purchases are planned only during the winter months. Transportation costs have decreased from $0.53 per Dth[8] in the previous filing to $0.51 per Dth[9] in the current application. The reduction in transportation costs is due to a lower rate for Kern River Gas Transmission Company (Kern River) with contracts moving to 'tier 2' rates. In total, the

[2] Exhibit 1.5, Page 1, Line 15, Column E.
[3] Pass-Through Model 10-01-2018 Update, Utah Summary by Class.
[4] Exhibit 1.4, Page 1, Column D, Line 12.
[5] Docket No. 18-057-04, Exhibit 1.4, Page 1, Column D, Line 12.
[6] Exhibit 1.4, Page 1, Column D, Line 13.
[7] Docket No. 18-057-04, Exhibit 1.4, Page 1, Column D, Line 13.
[8] Docket No. 18-057-04, Exhibit 1.4, Page 1, Column D, Line 15.
[9] Exhibit 1.4, Page 1, Column D, Line 15.

proposed base gas cost for customer rates will increase slightly from $3.33262 per Dth to $3.41715 per Dth or an increase of $0.08453 per Dth.[10]

In the previous filings, the 191 balancing account was under collected and the Commission approved the continued collection of $0.13552 per Dth amortization to the commodity cost. As of August 31, 2018, the commodity portion of the 191 Account was over-collected by $32.036 million and the Company is proposing to establish a credit amortization of $0.28833 per Dth to return the over-collection to customers. The combination of the change in gas cost and the change in the amortization rate results in a combined decrease in the commodity cost from $3.46814 to the proposed rate of $3.12882 per Dth or a reduction of $0.33932 per Dth.[11] Adjustments to the amortization rate occur annually in the fall pass-through filing. The Division will continue to monitor the balance in the 191 account on a monthly basis.

Gas Supply

For the test year, November 2018 through October 2019, the Company is projecting a total system requirement of 119.284 million Dth.[12] From the total requirement amount, 114.995 million Dths[13] will be used to meet the projected sales requirement, 0.561 million Dths[14] will be placed into storage and 3.728 million Dths will be used for gas volume reimbursement due to gathering, transportation and distribution fuel and shrinkage. Of the total gas requirement, 55.9%[15] will be satisfied from the Wexpro cost-of-service production, 17.0%[16] will be satisfied under current purchase contracts and 27.1%[17] will be purchased with future contracts and spot market transactions. The total expected fuel cost for the test period is $502.011 million.[18]

The cost-of-service gas from all Wexpro production indicates a total cost of $274.725 million at an average cost of $4.12 per Dth.[19] With the addition of the Wexpro II properties, the cost-of-

[10] Exhibit 1.6U, Page 1, Column F, Line 7.
[11] Exhibit 1.6U, Page 1, Column F, Line 9.
[12] Exhibit 1.4, Page 2, Column B, Line 3.
[13] Exhibit 1.6, Page 1, Column E, Line 4.
[14] Exhibit 1.4, Page 2, Column B, Line 4 + Line 5.
[15] Exhibit 1.4, Page 2, Column B, (Line 1 / Line 3).
[16] Exhibit 1.2, Column B, Line 3 / Exhibit 1.4, Page 2, Column B, Line 3.
[17] Exhibit 1.2, Column B, Line 4 & 5 / Exhibit 1.4, Page 2, Column B, Line 3.
[18] Exhibit 1.4, Page 1, Column B, Line 17.
[19] Exhibit 1.4, Page 1, Column D, Line 12.

service production has been separated and is provided as Wexpro I and Wexpro II. The separation of the cost allows the Company and the Division to monitor and compare the cost and production under the separate agreements. The Wexpro I production has a projected cost of $224.087 million at an average cost of $4.22 per Dth[20] including gathering cost. The Wexpro II production has a projected cost of $50.638 million at an average cost of $3.75 per Dth[21] including gathering cost. A large portion of the recent reduction in the price of Cost-of-Service gas can be attributed to the reduction in the federal tax rates.

While the price of Cost-of-Service gas from Wexpro has come down, the price of gas produced by Wexpro remains significantly higher than the current and projected market price. Wexpro has reported that the new drilling in the Wexpro II properties is producing gas at below market prices; however the small volumes from Wexpro II do not have a significant impact on the total cost-of-service price.

The cost-of-service gas production includes the operator service fee (OSF) payable to Wexpro of $241.822 million.[22] As part of its audit and review of the 191 account, the Division is reviewing the calculations and costs associated with the OSF in this filing as well as previous pass-through filings. Once the audit of the prior periods is complete, the Division will recommend that some of the prior pass-through filings that were approved with interim rates be made permanent.

Natural Gas Prices

The market price forecast anticipates natural gas prices of approximately [redacted] per Dth during the summer months and [redacted] per Dth in the winter months and is based on an average of future price projection from two different forecasting entities, CERA and PIRA. The two price forecasts along with the average are displayed in Chart 1 below.

[20] Exhibit 1.4, Page 1, Column D, Line 5.
[21] Exhibit 1.4, Page 1, Column D, Line 10.
[22] Exhibit 1.1, Page 21, Line 1636.

Chart 1 – CONFIDENTIAL

[redacted]

The forecast price for natural gas in the test period is significantly lower than the previous forecast for the summer months. Since market purchases are anticipated only during the winter months, the Company model uses the price for spot purchases during only the winter months. In the current filing, the Company uses an average forecast price of $2.54 per Dth[23] for spot and contract purchases. Chart 2 below, provides a comparison of the forecast market prices used in the current and the two previous pass-through applications. (Docket Nos. 18-057-04 and 17-057-20) and has been included to show how the forecast price has changed over the past 12 months. The solid line included in the graph is the historical first of month spot price for natural gas at Opal, Wyoming. (Opal FOM) The historical price has been included to show the fluctuation in the market price and to provide a comparison of the forecast price used to establish rates in the previous filings compared to the actual FOM market price.

[23] Exhibit 1.2 Column C, Line 6.

Chart 2 CONFIDENTIAL

[redacted]

A comparison of the forecast price used to set rates compared to the actual first of the month price is also helpful to understand the reasons for the over and under collection of gas costs in the 191 balancing account.

Pricing Hedges

The Wexpro production and the Company's gas storage facilities play an important role in the Company's plan to "hedge" against natural gas price volatility while meeting its total supply requirement. The current practices generally allow the Wexpro production to flow during the summer months to satisfy the summer demand in addition to allowing the Company to inject gas into storage for later use. Gas that has been injected into storage is withdrawn during the high demand winter heating season. The use of storage gas reduces but does not eliminate the need to purchase gas during the high demand winter months.

Supplier Non-Gas Costs (SNG)

In contrast to the price volatility that can occur with the market price of natural gas, the SNG costs have historically been relatively stable and predictable since these costs are set by contractual transportation and storage agreements and tariffs. These costs are associated with gathering and processing the Wexpro gas from the well-heads to market hubs, transporting market and Wexpro gas from market hubs to city gates and storing the gas in available facilities for later withdrawal during the winter months. While the contract amounts are relatively stable, the collection of these costs are estimated and are collected through volumetric rates, which are set assuming normal weather conditions. Variations in the actual volumetric sales due to changing weather conditions will impact the collection of these costs and will result in the over or under collection of SNG costs.

The forecast rates are structured so that the SNG balance is intended to have an over-collected balance of $20.0 million in the spring and a $20.0 million under-collected balance in the fall. The process of under and over collection during the year is intended to minimize the amount of interest paid or collected by the Company on the SNG costs included in the 191 balance. The amortization of the over or under collection is established annually in the spring pass-through filing. The Company is projecting total SNG costs for the test period of $105.870 million[24] for the forecast test-year plus the $8.079 million amortization of the under collected amount from the previous period for a total of $113.950 million. [25] If the current rates are not adjusted, the SNG revenue is projected to collect $122.032 million[26] resulting in an estimated over collected balance of $8.083 million.[27] In this filing, the Company is requesting a 6.63%[28] decrease in the total SNG rates in order to collect the forecast SNG cost.

SNG costs for transportation services have increased in recent years due to new and renegotiated contracts and the addition of peak hour contracts. The current filing includes a $0.874 million peak hour contract with Kern River and $1.226 million peak hour service contract with Dominion Energy Questar Pipeline (DEQP).. This filing also includes a credit of $262,000 for the disallowed portion of the DEQP peak hour contract as ordered in Docket No. 17-057-20.

The original filing incorrectly included a new transportation contract which will not be in service until the 2019-2020 heating season. That contracts has been removed in the updated exhibits and the associated cost has been removed from this application. The Company has provided the Division with an updated model and the associated exhibits. Updated exhibits and revised Tariff sheets will be provided to the Commission as part of the reply comments and will likely be discussed as part of the hearing scheduled for October 31, 2018.

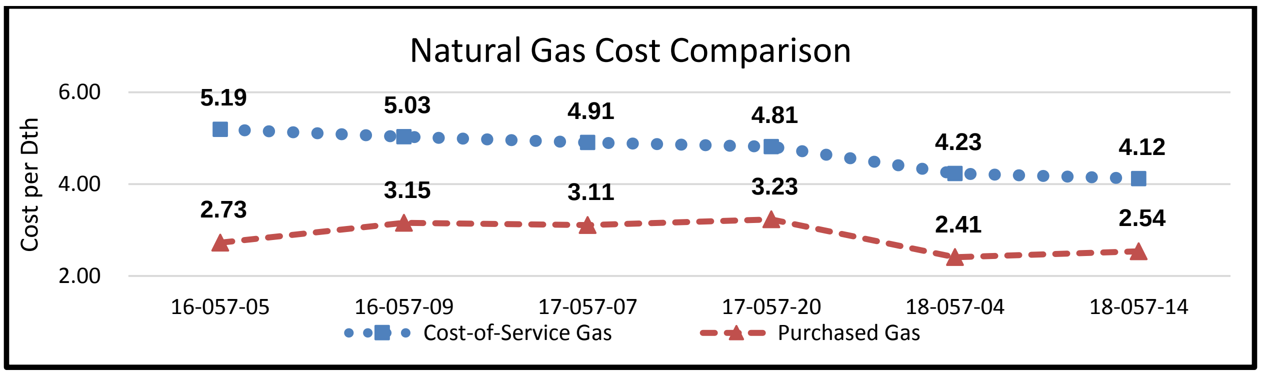
[24] Exhibit 1.6, page 2, Column D, Line 1.
[25] Exhibit 1.6, page 2, Column D, Line 3.
[26] Exhibit 1.6, page 2, Column D, Line 4.
[27] Exhibit 1.6, page 2, Column D, Line 5.
[28] Exhibit 1.6, page 2, Column D, Line 7.

Comparison to Previous Filing

QGC Exhibit 1.1 provides a detailed review of the actual natural gas production for each of the Wexpro I and Wexpro II wells for the last 12 months. The volumes identified in Exhibit 1.1, column E, reflect the historical well-head production; however, the price identified in column D represents the forecast price used in the test period. The historical volume and forecast price are used only to estimate the royalty payment for the test period. Well-head volumes do not include fuel gas, processing, and lost and unaccounted for gas and represent the lowest price per Dth prior to losses and processing.

The Company's application provides a forecast of anticipated costs and revenue for the test period as Exhibit 1.4. In order to compare the projected costs in the current filing with previous pass-through filings, the Division has prepared Chart 3 below. This chart provides a comparison of projected price per Dth for cost-of-service and purchased gas compared to the previous 5 pass-through filings. The dotted line indicates the cost-of-service price per Dth for COS gas production and includes both Wexpro I and Wexpro II. The dashed line indicates the price of purchased gas included in each filing.

Chart 3



In the current filing, the cost-of-service gas has decreased to $4.12 compared to $4.23 per Dth in the previous filing and purchased gas has increased to $2.54 compared to $2.41 per Dth. While the price of cost-of-service production has come down, the market price continues to be significantly lower than the Wexpro production. The Company has not indicated when it anticipates the cost-of-service price to be comparable with market purchases.

Effect on a typical GS Customer

If the proposed rates are approved independently, a typical GS residential customer would see an estimated decrease of $32.88 in their annual bill or a decrease of 5.16%.[29] The Division recommends the Commission approve the Application on an interim basis, with an effective date of November 1, 2018.

DOCKET NO. 18-057-15 – CONSERVATION ENABLING TARIFF BALANCING ACCOUNT)

In Docket No. 09-057-16, the Commission authorized the Company to establish and utilize a CET balancing account 191.9. The CET is a mechanism designed to ensure that the Company collects from GS customers only the Commission authorized revenue per customer. The tariff sets forth procedures for recovering the allowed distribution non-gas (DNG) revenue per customer by means of periodic adjustments to rates. The rate changes requested in Docket No. 18-057-15 affect only the CET component of the distribution natural gas (DNG) rates of the GS rate class.

Rate Details

In this filing, the Company proposes to amortize the August 2018 over-collected balance of $9.153 million. Exhibit 1.1 provides a summary of the accounting entries and monthly balances from July 2017 through August 2018. Exhibit 1.2, provides a summary of the changes in the winter and summer usage blocks. The CET amortization rates reflected in the GS Rate Class tariff sheets filed with this application will change for both blocks 1 and 2 of the summer and winter rates.

Effect on a typical GS Customer

If approved independently, a typical GS rate class customer would see a decrease in their annual bill of approximately $7.43 or 1.17%. The Division recommends the Commission approve the Application on an interim basis, with an effective date of November 1, 2018.

[29] Exhibit 1.7U, Line 14, Column F.

DOCKET NO. 18-057-16 – ENERGY EFFICIENCY DEFFERED ACCOUNT BALANCE

The proposed amortization rate includes the 2019 DSM/EE budget at $24.545 million plus the July 2018 under collected balance of $2.816 million as shown in Exhibit 1.1.[30] The proposed DSM/EE amortization rate is an increase from the current rate of $0.20370 to $0.25373 per Dth. The proposed $0.05003 increase will help to bring the December 2019 deferred expense balance to a more acceptable level and will help to minimize the DSM/EE interest expense.

Rate Details

The Division has examined the exhibits as filed with the application. Exhibit 1.1 is a summary of the Energy Efficiency deferred expense accounting entries for the period August 2017 through July 2018. The Energy Efficiency balance, as of the end of July 2018, was $2.816 million. Exhibit 1.2 is a summary of the deferred Energy Efficiency related expenditures by Energy Efficiency program (page 1) and by Energy Efficiency expenditure type (page 2) for the application period. The projected Energy Efficiency balance for December 2019 with and without the proposed amortization rate increase is shown in Exhibit 1.3.

The Company has proposed a DSM/EE amortization rate change that will incorporate the July 30, 2018, balance, the remaining 2018 budget forecast, and 2019 forecasted Energy Efficiency expense budget. If the Company's forecast responds as expected, the Energy Efficiency balance at the end of 2019 will not be zero but will be within an acceptable range. If no change is made, the 2019 ending balance is expected to exceed $8.0 million in under collection. Based on the current balance, projected volumes and the Energy Efficiency budget, the Company believes it will collect the required revenue while minimizing interest expense with an increase to the amortization rate. The Division will continue to monitor Schedule 182.4 and present recommendations if the actual expenses and revenues do not follow the Company's projections.

Effect on a typical GS Customer

[30] Exhibit 1.1, Column F, Line 13.

If the proposed increase to the amortization rate is approved by the Commission, a typical GS rate class customer will see an increase in their annual bill of approximately $4.01 or 0.63%.

DOCKET NO. 16-057-12 – LOW INCOME ASSISTANCE / ENERGY ASSISTANCE TARIFF RATE

The Division has reviewed the filing and exhibits and agrees with the calculations used to estimate the number of participants and the credit per customer. Based on the available balance, the forecast collection amounts in the test period and the estimated number of participants, the proposed $77.00 per customer appears to be appropriate.

Rate Details

In Docket No. 10-057-08, the Commission authorized the Company to establish an Energy Assistance Program with a target funding level of $1.5 million per year. QGC Exhibit 1.1 of this filing provides a summary of the annual account balance in the 191.8 account for year 1 through year 7 and monthly accounting entries for year 8 (August 2017 – July 2018). As of July 2018, the Company had over-collected $84,808 from ratepayers and has an unpaid balance of $319,982[31] in the 191.8 account. The combination of the unpaid balance and projected collections during the rate effective period will result in $1,735,174[32] available for credit to qualifying accounts.

The number of participants in this program has been decreasing since its inception. It is unclear if the improving economic conditions, recent changes in the HEAT administration program or the mild winter temperatures have caused the reduced participation. The previous 12 months indicates that there were 23,240 customers receiving the credit. The proposed credit assumes a slight increase to 21,432 participants during the next 12 months which will increase the allowed credit from $72.50 to $77.00 per customer. QGC Exhibit 1.2 column (F) shows the new low income assistance rate per Dth for each customer class.

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[31] Exhibit 1.1, Column F, Line 19.
[32] Exhibit 1.1, Column F, Line 28.

Effect on a typical GS Customer

If approved independently, the effect of this change for a typical GS residential customer is a decrease of $0.06 or 0.01% in their annual bill. The Division recommends the Commission approve the Application with an effective date of November 1, 2018.

SUMMARY AND CONCLUSION

The Company has filed five independent dockets with an effective date of November 1, 2018. Each docket has been independently evaluated and the customer impact for each docket has been calculated. Since all of the dockets have the same effective date, it is important to review the impact of the combined change in customer rates when all of the changes have been consolidated. Below is a summary of the individual change of each docket and the net customer impact if all five dockets are approved.

Docket	Title	$ Change	% Change
18-057-13	Transportation Imbalance	N/A	N/A
18-057-14	191 Pass-Through	($32.88)	(5.16%)
18-057-15	Conservation Tariff (CET)	($ 7.43)	(1.17%)
18-057-16	Energy Efficiency (DSM)	$ 4.01	0.63%
18-057-17	Low Income	($ 0.06)	(0.01%)
	COMBINED IMPACT	($36.36)	(5.71%)

The net impact if all of the dockets are approved is a decrease of $36.36 or 5.71% to a typical GS customer's annual bill. The Division supports and recommends the rate changes requested in Docket Nos. 18-057-13, 14 and 16 be approved by the Commission on an interim basis with an effective date of November 1, 2018 until the Division can complete an audit of the entries in the respective accounts. The Division also supports and recommends the rate changes requested in Docket Nos. 18-057-15 and 17 be approved by the Commission with an effective date of November 1, 2018. These dockets do not require an audit and do not need interim approval. The proposed changes are in the public interest and represent just and reasonable rates for Utah customers.

The Company will need to provide updated exhibits and tariff sheets that reflect the changes identified in Docket 18-057-14 along with updated tariff sheets that reflect the combined impact to customer rates if the Commission were to approve all five of the applications.

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Maria Wright, Division of Public Utilities