

Jenniffer Nelson Clark (7947)
Dominion Energy Utah
333 South State Street
P.O. Box 45360
Salt Lake City, Utah 84145
(801) 324-5392
(801) 324-5935 (fax)
jenniffer.clark@dominionenergy.com

Attorney for Dominion Energy

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF DOMINION)	
ENERGY UTAH'S APPLICATION)	Docket No. 19-057-11
FOR APPROVAL OF A SPECIAL)	
CONTRACT WITH FLEET SAVER,)	DOMINION ENERGY UTAH'S
LLC FOR RNGT SERVICE)	REPLY COMMENTS

Pursuant to the Utah Public Service Commission's (Commission) Notice of Comment Period dated January 15, 2021, Dominion Energy Utah (Dominion Energy, DEU or Company) respectfully submits these Reply Comments. The comments below address issues raised by the Utah Division of Public Utilities (Division) in its Action Request Response dated January 14, 2021 (Division's Comments).

On April 11, 2019, the Company filed an application in the above-referenced docket seeking the Commission's approval of a contract between the Company and Fleet Saver, LLC (Fleet Saver) involving renewable natural gas transportation. That contract provides, among other things, that Fleet Saver will collect biogas from landfills and other sources, process the biogas into pipeline-quality methane renewable natural gas (RNG). The agreement further provides that when the RNG enters the Company's system, it mixes with the Company's geologic natural gas supply and the Company transports the RNG to its natural gas vehicle (NGV) filling stations where it is

compressed for use in vehicles. At the NGV stations, to companies who have contracted with Fleet Saver will fill their compressed natural gas (CNG) vehicles.

The Division recommended approval of the contract, with some conditions that would ensure pre-existing NGV customers would not be adversely affected by the contract. On June 26, 2019, the Commission issued an Order approving the application, with the condition that the Company file a report containing the following information within 90 days after the first year the Fleet Saver Agreement took effect:

- a. the actual maximum one-day Fleet Saver amount at each station,
- b. the actual maximum hourly usage at each station, and
- c. any complaints by “normal” CNG customers and neighboring residents or businesses regarding Fleet Saver’s usage of the NGV filling stations.

On December 18, 2020 the Company filed its Status Update containing the required information (Company’s Report). The Company indicated that there have been no NGV customer complaints regarding Fleet Saver’s usage of the NGV filling stations (e.g., no non-Fleet Saver customers have complained that Fleet Saver customers are causing longer wait times or other issues, and no residents near the stations have complained about increased traffic). The Company also provided a spreadsheet with maximum one-day Fleet Saver usage at each NGV station, and the actual maximum hourly usage at each station.

On that same day, the Commission issued an Action Request to the Division, directing the Division to review the Company’s Report for compliance and to make recommendations. On January 14, 2020, the Division issued its Comments and recommended that the Company provide at least one more status update, in two years. The Division further indicated that if there were complaints in the future, the Commission could revisit the reporting requirements. The Division

recommended that the Commission order a status update, similar in format to the December 18, 2020 Status Update, by March 31, 2023, covering 2021 and 2022.

The Company appreciates the Division's input and recommendations and its collaboration on this issue. The Company supports the Division's recommendation and agrees to provide another Status Update by March 31, 2023 containing the same information listed above, and with 2021 and 2022 data.

DATED this 28th day of January, 2021.

Respectfully submitted,

DOMINION ENERGY UTAH



Jennifer Nelson Clark (7947)
Attorney for Dominion Energy Utah
333 South State Street
P.O. Box 45360
Salt Lake City, Utah 84145-0360
(801) 324-5392

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of Dominion Energy Utah’s Reply Comments was served upon the following persons by e-mail on January 28, 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
P.O. Box 146751
Salt Lake City, Utah 84114-6751
chrisparker@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
P.O. Box 146782
Salt Lake City, UT 84114-6782
mbeck@utah.gov

/s/ Ginger Johnson