

Jenniffer Nelson Clark (7947)  
Dominion Energy Utah  
333 South State Street  
P.O. Box 45433  
Salt Lake City, UT 84145-0433  
(801) 324-5392  
(801) 324-5935 (fax)  
[Jenniffer.clark@stoel.com](mailto:Jenniffer.clark@stoel.com)

Cameron L. Sabin (9437)  
Stoel Rives LLP  
201 South Main Street, Suite 1100  
Salt Lake City, UT 84111  
Phone: (801) 578-6985  
Fax: (801) 578-6999  
[Cameron.sabon@dominionenergy.com](mailto:Cameron.sabon@dominionenergy.com)

*Attorneys for Dominion Energy Utah*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE  
APPLICATION OF DOMINION  
ENERGY UTAH FOR APPROVAL OF A  
NATURAL GAS CLEAN AIR PROJECT  
AND FUNDING FOR THE  
INTERMOUNTAIN INDUSTRIAL  
ASSESSMENT CENTER

Docket No. 19-057-33

**MOTION TO VACATE  
SCHEDULING ORDER, STAY  
DISCOVERY, AND FOR A  
SCHEDULING CONFERENCE**

Questar Gas Company dba Dominion Energy Utah (Dominion Energy or Company) respectfully moves the Utah Public Service Commission (Commission) to vacate the remaining dates set forth in the Scheduling Order, Notice of Technical Conference, and Notice of Hearing (Scheduling Order), temporarily stay discovery in this matter, and, if appropriate, issue a Notice of Scheduling Conference after issuance of the Commission's Order addressing the Office of Consumer Services' (Office) Motion to Dismiss Application or, in the Alternative, Motion for Summary Judgment Denying the Application (Motion for Summary Judgment). The Company brings this Motion based upon the following:

The Commission recently granted intervention to Rocky Mountain Power in this docket. Rocky Mountain Power's participation has raised issues related to the confidential treatment of information provided by the Customer identified in the Application, the Customer's consultant, and the University of Utah (collectively the Third Parties). The Company is currently making attempts to work through these issues with the Third Parties, and with Rocky Mountain Power. Due to the pendency of the Motion, and uncertainty regarding when a decision on the Motion will be issued, the Company wants to ensure that the schedule in the matter affords adequate time both to resolve the complex confidentiality issues, and to make certain that Rocky Mountain Power receives appropriate information within a timeframe that would allow it to review and, if it chooses, file Direct Testimony in this docket. The Company is concerned that the current schedule does not provide adequate time to address both of these issues.

The Company also recognizes that the Motion for Summary Judgment is pending, and a Commission ruling on that motion may impact the scope of discovery and the need to provide the information that the Third Parties deem highly confidential.

Therefore, the Company proposes that the Commission vacate the remaining dates set forth in the Scheduling Order and temporarily stay any discovery until after it issues an Order on the Motion. Dominion Energy further requests that the Commission issue a Notice of Scheduling Conference, if appropriate, promptly after issuing an Order on the Motion for Summary Judgment to set dates for further proceedings.

The Company has consulted with the Office, the Utah Division of Public Utilities, Rocky Mountain Power, and the Utah Association of Energy Users and all referenced parties support, or do not oppose, this Motion.

Respectfully submitted this 16<sup>th</sup> day of March 2020.

/s/ Jenniffer Nelson Clark  
Jenniffer Nelson Clark (7947)  
Dominion Energy Utah  
333 South State Street  
PO Box 45433  
Salt Lake City, Utah 84145-0433  
(801) 324-5392  
Jenniffer.clark@dominionenergy.com

Cameron L. Sabin (9437)  
Stoel Rives LLP  
201 South Main Street, Suite 1100  
Salt Lake City, Utah 84111  
(801) 328-3131  
Cameron.sabin@stoel.com

*Attorneys for Respondent Dominion  
Energy Utah*

## CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Motion to Vacate Scheduling Order, Stay Discovery and for a Scheduling Conference were served upon the following persons by e-mail on March 16, 2020:

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](mailto:pschmid@agutah.gov)  
[jjeter@agutah.gov](mailto:jjeter@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, UT 84114-6751  
[chrisparker@utah.gov](mailto:chrisparker@utah.gov)  
[wpowell@utah.gov](mailto:wpowell@utah.gov)

Robert J. Moore  
Victor Copeland  
Assistant Attorneys General  
160 East 300 South  
P.O. Box 140857  
[rmoore@agutah.gov](mailto:rmoore@agutah.gov)  
[vcopeland@agutah.gov](mailto:vcopeland@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](mailto:mbeck@utah.gov)

Jana Saba  
Utah State Regulatory Affairs Manager  
Rocky Mountain Power  
1407 West North Temple, 330  
Salt Lake City Utah 84116  
Telephone: 801-220-2823  
Email: [jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)

Phillip J. Russell  
HATCH, JAMES & DODGE, P.C.  
10 West Broadway, Suite 400  
Salt Lake City, Utah 84101  
Telephone: (801) 363-6363  
Facsimile: (801) 363-6666  
Email: [prussell@hjdllaw.com](mailto:prussell@hjdllaw.com)

Jacob A. McDermott  
Senior Attorney  
Rocky Mountain Power  
1407 West North Temple, Suite 320  
Salt Lake City Utah 84116  
Telephone: 801-220-2233  
Email: [jacob.mcdermott@pacificorp.com](mailto:jacob.mcdermott@pacificorp.com)

