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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 DOMINION ENERGY UTAH'S REPLY COMMENTS
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Questar Gas Company dba Dominion Energy Utah (DEU or Company) respectfully submits these Reply Comments pursuant to the Utah Public Service Commission's (Commission) Notice of Filing and Comment Period issued on June 21, 2023 in the above-referenced docket (Notice).

On June 20, 2023, DEU filed its Annual Report related to the Sustainable Transportation and Energy Plan for the program year beginning on March 1, 2022 and ending February 28, 2023 (Report). On June 21, 2023, the Commission issued the Notice and directed any interested person to submit comments on or before July 20, 2023, and any Reply Comments on or before August 4, 2023. On July 20, 2023, the Utah Division of Public Utilities (Division) submitted an Action

Request Response (Response). The Company submits these Reply Comments in response to the Division's Response.

The Division's Response summarized the Intermountain Industrial Assessment Center's (IIAC) second year's program performance and recognized that the IIAC had completed the required 20 energy efficiency assessments and 40 clean air assessments for qualifying Utah businesses. The Division noted that Company's quarterly reports have been "informative and compliment DEU's annual report in this filing."

The Division noted that it had requested that the Company provide "a detailed illustration of the balancing account in Excel format with intact formulae and references in future filings that provide an accounting of the surcharge revenues, all expenses of the program, and carrying charge (including the calculation of the surcharge)," and that the Company had provided the information. The Company agrees that it will provide this same additional detail with its third and final annual report in June of 2024. The Company also commits to continue to work with the Division and Office to refine and improve the final quarterly and annual reports of the IIAC program to ensure that the Commission and all interested parties have access to accurate, complete, and useful information.

The Division's Response also discussed the implementation rate of projects that are recommended as a result of the IIAC's facility assessment. As part of the service, the IIAC performs a follow up survey of its recommendations, which occurs approximately 300 days after the facility assessment report has been issued to the customer. This survey is designed to determine the number of recommendations that are in progress or implemented. In the Company's 2022 Annual Report of the IIAC program, the implementation rate of recommended projects by

participating businesses was 45%. The Division’s Response states that they are “unconvinced that a 45 percent implementation rate is sufficiently high to have made the expenditures a prudent use of ratepayer funds.” However, national statistics of federally funded Industrial Assessment Center (IAC) programs would suggest the opposite conclusion. According to the national IAC database, from 1981 to 2022, the national IAC programs had an average implementation rate of 49.9%¹. The University of Utah’s IAC implementation rate of 45% is based on less than one year (300 days) of time for businesses to complete projects. The Company believes that, given a longer time period to complete and monitor projects, the University of Utah’s IAC implementation results would meet or exceed the national average.

The Division concluded its Response acknowledging that DEU, on behalf of the IIAC, has followed the Commission’s Orders for the quarterly and annual reports and recommended that the Commission acknowledge DEU’s 2022 Annual Report. The Company appreciates the Division’s analysis and agrees with this recommendation.

RESPECTFULLY SUBMITTED this 4th day of August, 2023.

DOMINION ENERGY UTAH



Jennifer Nelson Clark
Attorney for Dominion Energy Utah

¹ <https://iac.university/implementationRates>

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Dominion Energy Utah's

Reply Comments was served upon the following persons by e-mail on August 4, 2023:

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