

Jennifer Clark (7947)
Dominion Energy Utah
333 South State Street
P.O. Box 45433
Salt Lake City, Utah 84145-0433
(801) 324-5392
(801) 324-5935 (fax)
Jennifer.Clark@dominionenergy.com

Attorney for Dominion Energy Utah

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE)	
APPLICATION OF DOMINION)	Docket No. 19-057-T01
ENERGY UTAH FOR APPROVAL)	
OF MODIFICATIONS TO TARIFF)	DOMINION ENERGY UTAH'S
SECTION 2.06)	REPLY COMMENTS
)	
)	

Questar Gas Company dba Dominion Energy Utah (Dominion Energy or Company) respectfully submits these Reply Comments to the Division's Comments (Comments) issued by the Division of Public Utilities (Division) on March 19, 2019 in the above-referenced docket.

I. BACKGROUND

On January 22, 2019 the Company filed its Application to modify its Utah Natural Gas Tariff No. 500 (Tariff) to change the gas commodity (Commodity) and supplier non-gas cost (SNG) definitions in order to re-classify some of the costs. On January 29, 2019 the Utah Public Service Commission (Commission) issued a Scheduling Order which set a deadline of February 8, 2019 for interested parties to file initial comments. On February 8, 2019 the

Division filed its Action Request Response (Division's Response). On February 11, 2019 the Public Service Commission of Utah (PSC or Commission) issued a Notice to Dominion Energy Utah of Questions to Address at Hearing (Notice). On February 14, 2019 the Company filed a Motion to vacate the hearing that was scheduled for February 15, 2019 and to schedule a new Scheduling Conference. On February 20, 2019 the Commission issued an amended Scheduling Order. On March 11, 2019 the Company held a technical conference for the interested parties. On March 19, 2019 the Division filed revised comments in this Docket. The Company respectfully submits this Reply in response to the Division's Comments

II. DISCUSSION

In its Response, the Division indicated that it is not opposed to the proposed Tariff changes. While the Company agrees with the Division's conclusion that the Commission should approve the proposed Tariff changes, the Company would like to address one question that was unanswered in the technical conference and also make one recommendation related to the Division's Comments.

Value of Gas Stored Underground

During the March 11, 2019 technical conference a question was asked regarding the value of gas stored underground. All gas stored underground earns a return based on the value of the gas at the end of a month. The return is calculated in the Company's pass through filings on Exhibit 1.3, page 2. The questioner in the technical conference asked if the value of the gas stored underground would increase if the Commission were to approve the Application in this docket, and gathering costs of Company-owned production were re-classified as a Commodity cost. The answer to that question is no. The rate that is used to

value the gas stored underground can be found in exhibit 1.4, page 1 of the current pass-through format. A copy of DEU Exhibit 1.4 in Docket No. 19-057-04 (the most recent Pass-Through application) is attached as Exhibit 1 to these Reply Comments. The rate that is used to value the gas can be seen on line 12. The calculation of this rate includes gathering costs under the existing method and under the changes proposed in this docket.

SNG Allocation

In its Memo, the Division recommends that the Company review the allocation of SNG costs to each customer class in all future general rate case filings. However, the allocation of SNG costs to various customer classes is not at issue in this docket, and the Commission should not issue an Order dictating the time and place for review of a matter that is not presently before it. The Company affirmatively represents that it is reviewing those allocations and will address the subject in the next general rate case. The Commission, the Company and interested parties can determine at that time, and in that docket, whether future revisions are appropriate or necessary. The Commission need not issue any ruling to that effect here.

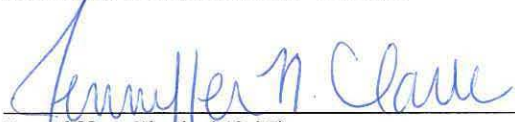
III. CONCLUSION

Based on the foregoing, the Company believes that the proposed Tariff changes are just and reasonable and in the public interest. Therefore, the Company requests that the Commission approve the changes detailed in the Company's Application in this Docket.

DATED this 29th day of March, 2019.

Respectfully submitted,

QUESTAR GAS COMPANY dba
DOMINION ENERGY UTAH

A handwritten signature in blue ink that reads "Jennifer N. Clark". The signature is written in a cursive style and is positioned above a horizontal line.

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

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served upon the following by electronic mail on March 29, 2019:

<p>Patricia E. Schmid Justin C. Jetter Assistant Attorney Generals 500 Heber M. Wells Building 160 East 300 South Salt Lake City, UT 84111 pschmid@utah.gov jjetter@utah.gov</p>	<p>Michelle Beck Director Office of Consumer Services 400 Heber M. Wells Building 160 East 300 South Salt Lake City, UT 84111 mbeck@utah.gov</p>
<p>Robert J. Moore Steven Snarr Assistant Attorneys General 160 East 300 South P.O. Box 140857 Salt Lake City, UT 84114-0857 rmoore@utah.gov stevensnar@utah.gov</p>	<p>Chris Parker Division of Public Utilities 400 Heber M. Wells Building 160 East 300 South Salt Lake City, UT 84111 chrisparker@utah.gov</p> 