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DEPARTMENT OF COMMERCE
Office of Consumer Services

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To: The Public Service Commission of Utah

From: The Office of Consumer Services

Michele Beck, Director
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Date: August 2, 2021

Subject: Docket 19-057-T04

**Dominion Energy Utah's GreenTherm Annual Report for the Year
Ending December 31, 2020**

INTRODUCTION

On June 30, 2021, Dominion Energy Utah ("DEU") filed with the Utah Public Service Commission ("PSC") its 2020 GreenTherm Annual Report. The Report provides information on DEU's voluntary renewable natural gas ("RNG") program, which DEU has trademarked as the "GreenThermSM" program. On July 2, 2021, the PSC issued a Notice of Filing and Comment Period that set a deadline of August 2, 2021 for parties to file initial comments and August 17, 2021 for reply comments on DEU's 2020 GreenTherm Report. Pursuant to the PSC's Notice, the Utah Office of Consumer Services ("OCS") submits these initial comments on DEU's Report.

OFFICE OF CONSUMER SERVICES COMMENTS

Reporting Requirements

The GreenTherm voluntary RNG program was authorized by the PSC in its July 30, 2019 Order which approved a July 9, 2019 settlement stipulation involving DEU, the OCS, the Utah Division of Public Utilities ("DPU") and the Utah Association of Energy Users ("UAE"). Paragraph 13 of the stipulation states that DEU's annual report to the PSC on the GreenTherm program will include details on the following five items:

1. The number of participating customers,
2. The amount of RNG purchased,
3. The number of RNG blocks sold,
4. The total customer contributions, and
5. Program expenses.

In addition to the program details listed above, the stipulation also stated that DEU would include in the annual report the following information:

- A showing that actual administrative costs were equal to or less than 30% of total actual costs¹
- An update on the status of the creation and adoption of an RNG green attribute verification standard²

The OCS has reviewed DEU's 2020 GreenTherm Report and found that DEU has included all the agreed-upon information listed above.

Collaborative Process

The GreenTherm settlement stipulation also stated that DEU would work with the OCS and the DPU in developing program enrollment and marketing materials and a participant "Welcome" letter.³ Also stipulated was that DEU would provide the OCS and DPU the results of an annual audit verifying the purchase, production and retirement of RNG green attributes.⁴

DEU provided its GreenTherm annual audit to the OCS and DPU on June 29, 2021. DEU also reached out to the OCS and DPU several times in 2019 and 2020 and also hosted meetings to collaborate on GreenTherm marketing materials, the Welcome letter and the participant annual report. The OCS appreciated this process and believes that it resulted in the GreenTherm program having informative, transparent and clear communication with DEU customers and in particular, with customers who decided to participate in the program. The OCS notes that the establishment of this new program is an example of how positive outcomes can be achieved when utilities, regulators and other stakeholders work together up front in a collaborative process.

RECOMMENDATION

The OCS recommends that the PSC approve DEU's 2020 GreenTherm Annual Report.

¹ July 9, 2019 Settlement Stipulation, Paragraph 7, subsection c.

² Id., Paragraph 14.

³ Id., Paragraphs 11 and 12.

⁴ Id., Paragraph 10.

cc:

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