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- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

Application of Dominion Energy Utah for Approval of Modifications of Tariff Sections 2.01, 4.01, and 5.01	DOCKET NO. 19-057-T05 Comments of the American Natural Gas Council, Inc.
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In accordance with the scheduling order issued by the Public Service Commission November 26, 2019 in this docket, the American Natural Gas Council, Inc. (“ANGC”) makes the following comments:

ANGC is an association of commercial and industrial utility consumers who are transportation and/or sales customers of Dominion Energy Utah (“DEU”) that transport and use small¹ to medium volumes of natural gas. Other businesses that support and work for these customers are also members of ANGC. ANGC members are directly affected by Tariff Sections 2.01, 4.01, and 5.01 of DEU’s tariffs and the changes DEU is proposing. ANGC does not support DEU’s proposed changes for the following reasons and makes the following recommendations:

1. The proposed changes, particularly for Section 5.01, do not solve the problem. The tariff still requires a customer transferring to the Transportation Service class to submit a fully executed contract for gas supply service to DEU by March 7th rather

¹ The characterization of these customers as “small” is only relative to very large customers who also use DEU’s gas transportation services. The “small” volumes referenced in this context typically use several thousand Dth of gas per year and are large gas users relative to the average GS customer that only uses about 100 Dth per year.

- than February 28th. Allowing customers one additional week to provide a fully executed gas supply contract is not reasonable or adequate. In that week, prospective TS customers will have to digest any changes in TS rates and policies the Commission approves in Docket No. 19-057-02, evaluate the economic impact of that decision on their operations and budgets, negotiate final gas pricing with a Competitive Service Provider, and submit a fully executed contract to DEU.
2. ANGCO does not support DEU's limited once-a-year window for enrollment under the TS schedule, but if the Commission maintains it, customers considering transferring to TS in 2020 should be given at least 30 days after the Commission's final order in Docket No. 19-057-02 to give DEU notice of intent to transfer and an additional two weeks to provide fully executed contracts for gas supply services. DEU could delay the enrollment process 30 days or more in 2020 without any adverse effects on the Company or its sales service customers.
 3. DEU's proposed additional week will not resolve the contracting problems prospective TS customers will face. If the Commission's decisions in Docket No. 19-057-02 change the economics for the TS class, one more week for customers to provide a fully executed contract still unnecessarily exposes them to additional unbudgeted costs to unwind gas supply commitments. Affected customers include, among others, schools, hospitals, libraries, and municipal wastewater treatment facilities, and the uncertainty caused by this issue makes it difficult for them to make decisions that are critical to their business and operations.
 4. DEU's policy requiring customers to give notice of intent to move to the TS class by February 15th with an executed contract by February 28th is an issue before the

Commission in Docket 19-057-02. In ANGC's experience, DEU is the only gas distribution company that has a tariff provision restricting enrollment in gas transportation service to one limited window of time each year. Other gas distribution companies with which ANGC interacts allow customers to convert to transportation service after giving a 60-day notice or some similar provision. DEU's tariff is onerous, anticompetitive, and the outlier in the country and the Commission should correct that in its order in the pending rate case.

5. ANGC alerted DEU to the notice and timing problems between the TS tariff and the pending rate case at the September 12, 2019 technical conference on cost of service. ANGC addressed this issue in the Phase II Direct Testimony of Bruce R. Oliver filed on November 14, 2019.
6. On November 15, 2019, DEU submitted its proposed tariff changes in this proceeding. As documented in Mr. Oliver's testimony, small volume customers taking service under rate TS are not the source of DEU's TS class cost recovery problem. There is no reason to limit smaller volume non-residential customers from using TS service.

DEU's proposed tariff changes do not resolve the problems they are intended to resolve, though ANGC agrees that more time is needed for customers to respond to the Commission's decisions in Docket No. 19-057-02. Therefore, ANGC urges the Commission to reject DEU's tariff proposals and instead, require that DEU delay its TS enrollment process during 2020 by at least 30 days until the Commission resolves the issues in Docket No. 19-057-02. This will help reduce the uncertainty the affected businesses experience because of the timing differences between DEU's tariff and the pending rate case.

Respectfully submitted this 4th day of December, 2019.

/s/Stephen F. Mecham
Stephen F. Mecham

Certificate of Service

I certify that on the 4th day of December, 2019, I served by electronic mail a true and correct copy of the foregoing Comments of the American Natural Gas Council, Inc. filed in Docket No. 19-057-T05 on the following:

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