

Jenniffer Nelson Clark (7947)
Dominion Energy Utah
333 South State Street
P.O. Box 45360
Salt Lake City, Utah 84145-0360
(801) 324-5392
Jenniffer.Clark@dominionenergy.com

Attorney for Dominion Energy Utah

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

)	
)	Docket No. 20-057-02
In the Matter of the Dominion Energy)	
Utah’s Integrated Resource Plan (IRP) for)	DOMINION ENERGY UTAH’S
Plan Year: June 1, 2020 to May 31, 2021)	REPLY COMMENTS
)	
)	

Questar Gas Company dba Dominion Energy Utah (Dominion Energy, DEU, or the Company) respectfully submits these Reply Comments to the Action Request Response issued by the Division of Public Utilities (Division) on September 1, 2020 (Division’s Response), and to the comments issued by the Office of Consumer Services (Office) in its Memorandum dated September 3, 2020 (Office’s Memo), in the above-referenced docket.

I. BACKGROUND

On June 12, 2020, the Company filed its Integrated Resource Plan (IRP) for the planning period of June 1, 2020, to May 31, 2021 (2020-2021 IRP). On June 26, 2020, the Utah Public Service Commission (Commission) issued a Scheduling Order that permitted interested parties to submit comments by September 3, 2020 and reply comments by October 13, 2020. On September 1, 2020, the Division filed its Action Request Response and on

September 3, 2020, the Office filed its Memorandum regarding the Company's 2020-2021 IRP. The Company respectfully submits this Reply in response to the Division's Response and the Office's Memo.

The Company appreciates the comments and feedback offered by the Office and Division and looks forward to working with the parties to improve the IRP process going forward.

II. REPLY TO ISSUES IDENTIFIED BY THE OFFICE AND THE DIVISION

A. Joint Operating Agreement between DEU and DEQP

Both the Office and the Division recommended that DEU provide additional detail about how it would manage the Joint Operating Agreement (JOA) between DEU and Dominion Energy Questar Pipeline (DEQP) following Dominion Energy, Inc.'s sale of interstate pipeline assets to Berkshire Hathaway Energy (BHE). Division's Response at p. 3; Office's Memo at p. 6. The Company recognizes the importance of the JOA and will continue to work with DEQP to update important joint operating details.

It is possible that after the sale of the pipeline assets to BHE closes, BHE may prefer a different contractual arrangement to govern the operation of interconnects between DEU and DEQP. While it is too early to know whether the JOA will continue to exist in its current form, both DEU and DEQP will continue to collaborate and to have an agreement in place that addresses the details regarding the pressures and flows available at the jointly operated gate stations, as well as operational and facilities responsibilities. Any such process will require detailed collaboration because the flows at these stations fluctuate through the day to match the changing demands on the DEU system. The Company does not anticipate that the sale of pipeline assets to BHE will have an adverse effect on its ability to continue to work

with DEQP, its ability to continue to operate interconnects with DEQP, or its ability to continue to provide safe and reliable service to its customers.

B. Operational Changes vs. IRP SENDOUT Modeling

The Division indicated that it “spoke with Company personnel” about operational changes that “over-ride the SENDOUT model recommendations”. Division’s Response at p. 10. The Company explained that it is always looking for opportunities to minimize costs. Some of these opportunities may be unknown at the time of the IRP filing. The Company agrees to provide details on any relevant changes that impact costs. These changes will be reported in the IRP variance reports.

C. Stakeholder Meeting – March 10, 2020

In its Memo, the Office noted that the Company met with stakeholders on March 10, 2020 to “discuss concerns regarding the sufficiency of information in the IRP.” Office’s Memo at p. 2, quoting the Commission’s Order issued January 16, 2020 in Docket No. 19- 057-01. The Office also suggested that DEU provide an update about that meeting in its reply comments and also address such meetings in a pre-filing technical conference during the upcoming 2021-2022 IRP docket. The Company appreciated the opportunity to meet with the Office and the Division and found the March 10th meeting to be beneficial. The Company incorporated the results of the meeting (described in greater detail below) into the 2020-2021 IRP. In the future, the Company will incorporate a summary of any similar meetings in the subsequent IRP and will address this topic in technical conferences in future IRP proceedings.

Representatives of DEU, the Office and the Division participated in the March 10th meeting. The meeting participants discussed and agreed upon the following:

- i. During the March 10, 2020 meeting, the Company explained the differences between highest sendout day and a Design Day and this explanation is now included under

“Firm Customer Design Day Gas Demand” in the Customer and Gas Demand Forecast section of the 2020-2021 IRP.

- ii. As a result of the March 10, 2020 meeting, the Company added a “Long-Term Planning” subsection to the System Capabilities and Constraints section of the 2020- 2021 IRP and future IRPs will include a Long-Term Planning subsection. This subsection will include discussion of growth projections and potential future projects. Because the Long-Term Planning section includes discussion of projects in the more-distant future, this section will not include detail relating to specific timing or cost. Projects planned for the nearer-term will be discussed in detail, including timing and cost details, in the Distribution Action Plan section of the IRP.
- iii. The Company also added detail to the Distribution Action Plan as result of this collaboration. The Company now includes all necessary details regarding projects rather than referencing descriptions included in prior year’s IRPs. Justifications for these projects are included in the System Capabilities and Constraints section of the IRP.
- iv. Questions about Lost and Unaccounted for Gas were addressed in the “Gas Lost and Unaccounted For” subsection of the Customer and Gas Demand section of the IRP. Descriptions of the potential sources of variances are now provided in this section. The Company also includes descriptions of programs designed to reduced lost gas in this section as well as in the Sustainability section of the IRP.
- v. The meeting also included a discussion of the JOA between DEU and DEQP. The explanation of the JOA in the System Capabilities and Constraints section of the IRP was updated to include additional details as a result of this discussion. In response to Office and Division inquiries, the Company offered explanation and information

pertaining to variances in the integrity management section of the IRP, Wexpro shut-ins, and emergency planning. Those in attendance agreed that though each of these topics may warrant additional conversation, there was no need to include additional information relating to the topics in the IRP.

- vi. Meeting participants also discussed potential financial hedging programs going forward. The Company is currently evaluating hedging opportunities, will develop a proposed plan, and will be soliciting feedback from both the Office and the Division in the near future.
- vii. The Company also agreed to include a “Glossary of Terms” in the IRP going forward.

D. COVID-19 Updates

The Office also noted that the COVID-19 pandemic persists and recommended that “the [Commission] require DEU to provide pandemic related IRP updates in its quarterly variance reports and next year’s IRP”. Office’s Memo at p. 2. To address these concerns, the Company agrees to provide pandemic-related updates in the quarterly variance reports going forward.

E. Supply Reliability

The Office observed that the 2019-2020 IRP contained a “Supply Reliability” section and recommended that “DEU should be required to report on the operations and performance of the LNG storage facility when it becomes operational, especially in relation to its impacts on DEU’s IRP planning process” and “provide adequate information, as defined in DEU’s IRP guidelines, of any efforts to move forward with any other supply reliability resources, such as satellite LNG facilities”. Office’s Memo at p. 3. As a result, the Company will include a Supply Reliability section in future IRPs. The section will include updates on the operation of the LNG facility and discuss any other concerns regarding supply reliability.

F. Customer and Gas Demand Forecast – Alternatives to Natural Gas

The OCS recommended that “DEU in its next IRP refresh its heat pump study to determine if natural gas demand may be impacted.” The Company has not seen a noticeable impact on natural gas demand caused by the utilization of heat pumps. The Company proposes that, should heat pump adoption impact natural gas demand, the Company will discuss the matter in its annual energy efficiency budget proceedings.

G. Sustainability

The Office noted the Sustainability section of the 2020-2021 IRP referenced sustainability goals for both Dominion Energy, Inc. and Dominion Energy Utah. The Office recommended that the Company offer greater clarity in identifying which entity was advancing goals, and how the programs in the West contribute to these goals. Office’s Memo at pp. 4-6. The Company will offer greater clarity in the future and will provide specific emphasis for updates on projects in the West.

H. Long Term Planning

The Office commended the Company for the addition of a Long-Term Planning subsection to the 2020-2021 IRP and encouraged the Company to provide as much detail as possible on long-term projects in order to “minimize surprises in future regulatory filings.” Office’s Memo at pp. 6-7. The Company agrees to provide as much information as it has available. As noted above, many long-term projects are conceptual and do not yet have detailed associated plans. As these concepts become more defined, they become projects that can be more specifically described. Longer-term concepts will be addressed in the Long-Term Planning section of the IRP and near-term projects will be discussed in greater detail in the Distribution Action Plan section of the IRP.

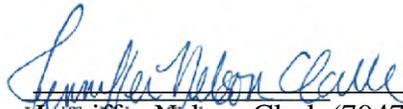
III. CONCLUSION

The Company requests that the Commission acknowledge the 2020-2021 IRP as recommended by the Division. The Company will provide the additional information as indicated herein. The Company will continue to work with the Division and Office and other interested parties to improve its IRP process in the future.

Dated this 7th day of October, 2020.

Respectfully submitted,

DOMINION ENERGY UTAH



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

CERTIFICATE OF SERVICE

This is to certify that a copy of Questar Gas Company dba Dominion Energy’s Reply Comments, in Docket No. 20-057-02, was sent by electronic mail on October 7, 2020 to the following:

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 jjetter@agutah.gov Counsel for the Division of Public Utilities	William Powell Madison Galt Utah Division of Public Utilities 160 East 300 South P.O. Box 146751 Salt Lake City, Utah 84114-6751 wpowell@utah.gov mgalt@utah.gov
Robert J. Moore Victor P. Copeland Assistant Attorneys General 160 East 300 South P.O. Box 140857 Salt Lake City, UT 84114-0857 rmoore@agutah.gov 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

_____/s/ Rena Porter