

Jennifer Nelson Clark (7947)  
Dominion Energy Utah  
333 South State Street  
P.O. Box 45360  
Salt Lake City, Utah 84145  
(801) 324-5392  
(801) 324-5395 (fax)  
*Jennifer.Clark@dominionenergy.com*

*Attorney for Questar Gas Company  
dba Dominion Energy Utah*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

IN THE MATTER OF THE FORMAL COMPLAINT OF FRANKIE BAKER AND RUSTY BAKER AGAINST DOMINION ENERGY UTAH	Docket No. 20-057-04  <b>DOMINION ENERGY'S RESPONSE</b>
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Respondent, Questar Gas Company dba Dominion Energy Utah (“Dominion Energy” or “Company”), respectfully responds to the *Complaint of Frankie Baker and Rusty Baker Against Dominion Energy Utah* as follows:

**RESPONSE TO COMPLAINT**

1. Frankie Baker and Rusty Baker (“Complainants”) raise primarily two issues: (1) that they have had difficulty getting a medical letter to extend service notwithstanding their account delinquency and; (2) they would like to work with Dominion Energy to retain service during cold weather months
2. Dominion Energy reinstated service to Complainants home on February 21, 2020, as a result of the Complaint. On February 25, 2020, Complainants entered into a Deferred Payment Agreement with Company to address amounts owed. A letter evidencing this agreement is attached as DEU Confidential Exhibit A.

3. Dominion Energy has since ceased terminating natural gas service for non-pay, and has commenced reinstating service to those who have had service discontinued as a result of non-payment. See Order Granting Motion, Docket No. 20-057-T03. Accordingly, Complainants are currently receiving natural gas service and will continue to receive natural gas service for the foreseeable future.

4. Complainants have a long history of account delinquency with Company. Most recently, on April 26, 2017, Complainants filed bankruptcy with the Utah Bankruptcy Court bearing case number 17-23552. Complainants had an outstanding balance due and owing for their natural gas service in the amount of [REDACTED]. Prior to this time, Complainants had received continued service as a result of multiple Medical Letters indicating that service was necessary to avoid aggravation of a serious illness or infirmity. Each such letter had expired by the time Complainants filed for bankruptcy.

5. The Bankruptcy case was dismissed on November 15, 2017, for failure to make plan payments. As shown on the Customer Account Itemization attached hereto as DEU Confidential Exhibit B, the [REDACTED] plus interest and gas usage totaling the sum of [REDACTED] was transferred back to the Complainants' account. As further shown on DEU Confidential Exhibit B, there was a credit balance of [REDACTED] resulting in an outstanding balance of [REDACTED].

6. On November 21, 2017, an Urgent Notice was mailed to Complainants which identified the outstanding balance of [REDACTED]. See DEU Confidential Exhibit C.

7. On or about August 27, 2018, Complainants filed Bankruptcy in the Utah Bankruptcy Court bearing case number 18-26373. Complainants had a delinquent account in the total sum of [REDACTED] at the time of filing.

8. On January 6, 2020, Company sent out a ten (10) day warning letter for a post-petition outstanding balance due in the sum of [REDACTED] for natural gas usage.

9. On January 15, 2020, Company called the Complainants regarding their past due account.

10. On January 21, 2020, Company spoke with Complainants and offered a payment arrangement at which time Complainants said they would call back.

11. On January 27, 2020, Complainants requested, and Company provided via facsimile a Medical Letter form.

12. Complainants called Company on February 5, 2020, to inquire about the status of the Medical Letter and indicated they were going to the doctor on February 11, 2020, to have it completed. During the phone call, Complainants were advised of the pending termination of natural gas service for nonpayment and that service could not be guaranteed without a signed medical letter.

13. The Bankruptcy matter bearing case number 18-26373 was dismissed on February 13, 2020, for failure to make plan payments.

14. The Complainants submitted a Medical Letter dated February 14, 2020, in which the medical provider indicated that the referenced patient was not suffering from a serious illness or infirmity and that termination of natural gas service would not aggravate such a condition. A copy of that Medical Letter is attached as DEU Confidential Exhibit D. Company made repeated attempts to contact Complainants but could not reach them and could not leave messages because Complainants' voicemail was full.

15. On or about February 18, 2020, Company terminated service for non-payment at Complainants home.

16. On February 19, 2020, a Bankruptcy Dismissal Notice advising of the past due amounts was sent to Complainants. *See* DEU Confidential Exhibit E.

17. On February 20, 2020, Complainants filed the Formal Complaint in this docket, and on February 21, 2020, the Company reinstated service to Complainants pending the resolution of this matter.

18. Complainants subsequently entered into a Deferred Payment Agreement as referenced above.

19. The Company has complied in all respects with applicable statutes, rules, regulations and provisions of its Utah Natural Gas Tariff No. 500 (“Tariff”). Of particular note, the Company provided Complainants with information required to procure a Medical Letter pursuant to R746-200-7, but Complainants failed to provide Medical Letter authorizing continued service as a result of serious illness or infirmity. The Company also entered into a Deferred Payment Agreement with Complainants, as required by R746-200-5. Finally, Company reinstated service to Complainants prior to the Order Granting Motion in Docket No. 20-057-T03.

20. Complainants are currently receiving natural gas service, and have made arrangements to pay remaining balance on their account.

THEREFORE, the Company respectfully request that the Commission find in the Company’s favor and deny further relief to Complainants.

DATED: March 23, 2020.

/s/Jennifer Nelson Clark  
Jennifer Nelson Clark  
Questar Gas Company dba Dominion Energy Utah  
*Attorney for Dominion Energy Utah*

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **DOMINION ENERGY'S RESPONSE** was served by email upon the following as set forth below on March 23, 2020:

Patricia E. Schmid Justin C. Jetter Assistant Attorneys General 160 E. 300 South P.O. Box 140857 Salt Lake City, UT 84114-0857 <a href="mailto:pschmid@agutah.gov">pschmid@agutah.gov</a> <a href="mailto:jjeter@agutah.gov">jjeter@agutah.gov</a> Counsel for the Division of Public Utilities	Chris Parker William Powell Utah Division of Public Utilities 160 E. 300 South P.O. Box 146751 Salt Lake City, UT 84114-6751 <a href="mailto:chrisparker@utah.gov">chrisparker@utah.gov</a> <a href="mailto:wpowell@utah.gov">wpowell@utah.gov</a>
Robert J. Moore Victor Copeland Assistant Attorneys General 160 E. 300 South P.O. Box 140857 <a href="mailto:rmoore@agutah.gov">rmoore@agutah.gov</a> <a href="mailto:vcopeland@agutah.gov">vcopeland@agutah.gov</a> Counsel for the Office of Consumer Services	Michele Beck Director Office of Consumer Services 160 E. 300 South P.O. Box 146782 Salt Lake City, UT 84114-6782 <a href="mailto:mbeck@utah.gov">mbeck@utah.gov</a>
Frankie Baker Rusty Baker 46425 S 1900 W #50 Roy, UT 84067 VIA U.S. MAIL Complainants	

/S/Leora Abell \_\_\_\_\_