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dba Dominion Energy Utah*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

DOMINION ENERGY UTAH'S INTEGRATED RESOURCE PLAN FOR PLAN YEAR: JUNE 1, 2021 TO MAY 31, 2022	Docket No. 21-057-01 PETITION FOR HIGHLY CONFIDENTIAL TREATMENT AND ADDITIONAL PROTECTIVE MEASURES UNDER UTAH ADMINISTRATIVE CODE RULE R746-1-601(2)(a)
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Pursuant to Utah Admin. Code Rule R746-601(2), Questar Gas Company dba Dominion Energy Utah (DEU, Dominion Energy, or Company) hereby petitions the Public Service Commission of Utah (Commission) to (i) authorize Dominion Energy to designate certain information provided in this matter to the Utah Division of Public Utilities (Division), the Utah Office of Consumer Services (Office), and to the Commission, as “Highly Confidential,” and (ii) approve additional protective measures for those materials. Specifically, DEU requests that the Commission approve Highly Confidential treatment and additional protective measures for information submitted by bidders in response to the Company’s request for proposal (RFP) for fixed-price contracts. DEU requests that the information described herein be designated in the

Company's exhibits as "Highly Confidential" and be made available only to the Office, the Division, and the Commission and its staff.

BACKGROUND

On January 11, 2021, the Company filed a Notice of Intent to file its Integrated Resource Plan for Plan Year: June 1, 2021 to May 31, 2022 (IRP). On June 14, 2021, the Company filed its IRP. In the IRP, the Company indicated that it "is considering additional price stabilization resources to minimize . . . exposure on high demand days. The resources being considered include . . . additional [First-Of-Month] supply contracts The Company will continue to review these alternatives with stakeholders prior to adding any alternatives for the 2021-2022 heating season." IRP at p. 8-4. The Company met with the Division and the Office on several occasions between February, 2021 and August of 2021 to discuss options for price stabilization measures during the 2021-2022 IRP year. On August 27, 2021, the Company issued a Request for Proposal for fixed-price supply contracts (the RFP). On September 2, 2021, the Company received responses to the RFP and met with the Division and the Office to discuss those responses. On that same day, the Company selected options from among those bids.

On September 9, 2021, the Company filed a Motion to Modify the Scheduling Order seeking a technical conference to discuss its price-stabilization activities. On September 14, 2021, the Commission issued an Order Granting Motion, Amended Scheduling Order, and Notice of Virtual Technical Conference indicating that it will hold a Technical Conference on September 22, 2021 to do so.

In the Course of its discussions with the Office and the Division, the Company has disclosed information related to the bidders who responded to the RFP, those that were selected,

and the pricing related to those fixed price supply contracts. The Company intends to disclose similar information during the Technical Conference on September 22nd.

ARGUMENT

The Utah Administrative Code provides, in relevant part, as follows:

- (a) A person that files or is requested to provide information that the person considers to be highly confidential shall promptly:
 - (i) negotiate with the other parties mutually agreeable protections; or
 - (ii) petition the Commission for an order granting additional protective measures.
- (b) The petitioning party shall set forth:
 - (i) the particular basis for the claim;
 - (ii) the specific, additional protective measures requested, which may include restricting or prohibiting specific individuals from accessing information; and
 - (iii) the reasonableness of the requested, additional protection.

Utah Admin. Code Rule R746-601(2)(a) & (b).

The basis for this Petition is that the Company has received confidential bids from bidders for fixed-price gas supply contracts. The identity of those bidders, the composition of the packages offered, and the pricing offered should be maintained as Highly Confidential because that information is competitively sensitive and could be used by competitors to gain an unfair and improper competitive advantage. Disclosure of such information would also impair the Company's ability to negotiate favorable terms on such contracts in the future. For these reasons, the Company believes the relief sought in this Petition is warranted.

At present, the Office and the Division are the only intervenors in this docket, and each has full access to all of the above-referenced information. Both the Office and the Division have

indicated that they do not oppose this Petition. If any future intervenor in this docket later proffered a legitimate reason for needing the information, the Commission could assess at that time whether the proffered reason justifies a modification of the requested protective measures.

REQUEST FOR RELIEF

For the foregoing reasons, and pursuant to Utah Admin. Code Rule R746-601(2), Dominion Energy respectfully requests that the Commission issue an order pursuant to Utah Admin. Code Rule R746-601(2) authorizing the Company to treat the identity of the bidders who responded to the RFP, as well as the composition of packages and pricing offered, as Highly Confidential and limiting access to the Highly Confidential information to the Office the Division and the Commission and its staff (and their respective counsel and consultants) as more fully set forth above.

DATED this 16th day of September, 2021.

Respectfully submitted,



Jenniffer Nelson Clark
Dominion Energy Utah

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing **PETITION FOR
HIGHLY CONFIDENTIAL TREATMENT AND ADDITIONAL PROTECTIVE
MEASURES UNDER UTAH ADMINISTRATIVE CODE RULE R746-1-601(2)(a)** was
served upon the following persons by email on September 16, 2021:

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