
Dominion Energy Utah's Integrated Resource Plan for Plan Year June 1, 2021 to May 31, 2022	<u>DOCKET NO. 21-057-01</u>
	<u>ORDER</u>

ISSUED: January 7, 2022

On June 14, 2021, Dominion Energy Utah (DEU) filed its Integrated Resource Plan for Plan Year June 1, 2021, to May 31, 2022 ("2021-2022 IRP") with the Public Service Commission (PSC), in accordance with standards and guidelines for annual IRP reporting set forth in our Report and Order in Docket No. 08-057-02 ("Standards and Guidelines").¹

The Division of Public Utilities (DPU) and the Office of Consumer Services (OCS) each filed comments on October 1, 2021 (each referred to as "DPU Comments" and "OCS Comments", respectively), and DEU filed reply comments on October 27, 2021 ("DEU Reply Comments").

I. SUMMARY OF THE 2021-2022 IRP

The 2021-2022 IRP presents DEU's plan to meet, provide infrastructure for, and manage its ongoing natural gas demand. It includes annual forecasts, summaries of system and gas modeling activities, and resource selection results. It also includes regulatory and resource discussions and operational challenges that DEU faced during the previous year and that it could face in the future. The IRP includes an estimate of firm customer demand based on a gas day when the mean temperature is -5 degrees Fahrenheit at the Salt Lake City International Airport weather station ("Design Day planning metric").

¹ See *In the Matter of the Revision of Questar Gas Company's Integrated Resource Planning Standards and Guidelines*, Docket No. 08-057-02, Report and Order on Standards and Guidelines for Questar Gas Company, issued March 31, 2009. Questar Gas Company is now Dominion Energy Utah.

Specifically, DEU submits the following key forecasts for the 2021-2022 IRP year:

- (1) A Design Peak-Day firm sales demand of approximately 1.23 million decatherms (MMDth) at the city gates for the 2021–2022 heating season.²
- (2) A cost-of-service gas production level of approximately 58.4 MMDth, assuming the completion of new development drilling projects, a level that comprises 49.6 percent of DEU’s forecast demand.
- (3) “[B]alanced portfolio”³ gas purchases in the amount of approximately 60 MMDth.
- (4) Transmission integrity management programs and distribution integrity management programs with projected costs of \$8.5 million and \$1.8 million, respectively, in 2021, \$7.3 million and \$2.1 million, respectively, in 2022, and \$7.9 million and \$2.2 million, respectively, in 2023.
- (5) In response to the February 2021 national weather events that impacted natural gas prices, DEU implemented a gas hedging strategy under which it procured an additional 80,000 Dth/day through first-of-month fixed price contracts for the 2021–2022 heating season.⁴

DEU identifies the following commitments arising out of the IRP process:

- (1) DEU will seek to maintain flexibility in purchase decisions pursuant to the planning guidelines listed in the IRP to account for variance between actual weather and load conditions and assumed conditions in the modeling simulation.
- (2) DEU will continue to monitor and manage producer imbalances.
- (3) DEU will continue to promote cost-effective energy-efficiency measures.
- (4) DEU will continue to review possible contract options to provide affordable firm transportation capacity and currently has numerous contracts in place with multiple companies to ensure projected demand is met.
- (5) DEU will continue to evaluate and review possible contract options to serve peak-hour requirements. In past heating seasons, DEU accomplished this through Firm Peaking Services offered by Kern River Gas Transmission and Dominion Energy Questar Pipeline (DEQP).

² DEU’s firm sales design day scenario is based on 70 heating degree days in the Salt Lake region; mean daily wind speed of 9.5 mph as measured at the Salt Lake City Airport weather station; and the day is not a Friday, Saturday, Sunday, or a winter holiday.

³ 2021-2022 IRP at 1-1.

⁴ DEU’s Submission of Supplemental Information at 3, September 14, 2021.

- (6) DEU will continue using storage services and storing natural gas in underground storage facilities to respond to Design Day demands.
- (7) DEU has purchased land and is proceeding with its plans to build an LNG facility for supply reliability purposes. DEU states the facility will have 9 million gallons of LNG available for vaporization for the 2022–2023 heating season. In subsequent heating seasons the full 15 million gallons will be available for vaporization.
- (8) DEU will reduce methane emissions by replacing aging infrastructure, conducting leak surveys, reducing third-party damages, offering renewable natural gas, establishing a carbon offset program, and other programs. These initiatives are part of DEU’s announced commitment to net zero carbon and methane emissions across its nationwide electric generation and natural gas infrastructure operations by 2050.

The 2021-2022 IRP provides price, sales, peak demand, throughput, and usage per customer information, as summarized in the tables below. In some instances, the tables also include 2018 information, where available, to compare the year over year differences:

**Table 1. Price (\$/Dth)
(2021-2022 IRP at 8-1:8-2 and 2020-2021 IRP (as defined below) at 8-1)**

Actual First of Month Index Price for Natural Gas on Dominion Questar Pipeline			
Annual average price (January–December)	2020: \$2.07	2019: \$2.59	2018: \$2.63
Heating season average price (November– March)	2020–2021: \$3.00	2019-2020: \$2.48	2018-2019: \$4.06

Note: DEU forecasts a price of approximately \$3.32 per Dth for the 2021-2022 heating season.

**Table 2. Sales (MMDth)
(2021-2022 IRP at 3-2, Exhibit 3.10 and 2020-2021 IRP at 3-1, Revised Exhibit 3.10)**

Annual System Sales	<u>2021-2022 IRP</u> Forecast for 2021/22-2030/31 Heating Seasons	<u>2020-2021 IRP</u> Forecast for 2020/21-2029/30 Heating Seasons	<u>2021-2022 IRP</u> Actual Results for 2019-2020 Heating Season
Temperature-adjusted sales ⁵	117.8–131.5	115.9–125.5	115
Actual sales			112

**Table 3. 2021-2021 IRP and 2020-2021 IRP: Peak Demand (MMDth/day)
(2021-2022 IRP Exhibit 3.9 and 2020-2021 IRP Exhibit 3.9)**

Peak Demand at City Gate	<u>2021-2022 IRP</u> Forecast for 2021-2020 Heating Season	<u>2020-2021 IRP</u> Forecast for 2020-2021 Heating Season	<u>2021-2022 IRP</u> Actual Results for 2020-2021 Heating Season
Firm Transportation	0.465	0.467	0.311
Firm Sales	1.229	1.232	0.752
Total	1.694	1.699	1.063

**Table 4. System Throughput (MMDth)
(2021-2022 IRP at 3-2, Exhibit 3.10 and 2020-2021 IRP at 3-2, Revised Exhibit 3.10)**

System Throughput	<u>2021-2022 IRP</u> Forecast for 2021/22-2030/31 Heating Seasons	<u>2020-2021 IRP</u> Forecast for 2020/21-2029/30 Heating Seasons	<u>2021-2022 IRP</u> Actual Results for 2019-2020 Heating Season
Temperature-adjusted system throughput	215.5–229.8	212.5–223.3	206
Actual system throughput			206

⁵ The projections contained in the IRP reflect: (1) the temperature and elevation compensation the PSC approved in *In the Matter of the Application of Questar Gas Company to Increase Distribution Non-Gas Rates and Charges and Make Tariff Modifications*, Docket No. 09-057-16, Report and Order, issued June 3, 2010, and (2) updated normal heating degree days baseline for the Utah GS usage approved by the PSC in *Application of Dominion Energy Utah to Increase Distribution Rates and Charges and Make Tariff Modifications*, Docket No. 19-057-02, Report and Order, issued February 25, 2020. The prior baseline was derived from a 30-year average ending December 2010 and the new baseline uses a 20-year average ending December 2018. The latter reduces usage normalized to the prior baseline by about 2.3 percent.

Table 5. Usage per Customer (Dth)
(2021-2022 IRP at Section 3, Exhibits 3.1-3.11 and 2020-2021 IRP at Section 3, Exhibits 3.1-3.11)

Temperature Adjusted Average Annual Usage per Customer (During 12-month Heating Seasons)	<u>2021-2022 IRP</u> Forecast for 2021/22-2030/31 Heating Seasons	<u>2020-2021 IRP</u> Forecast for 2020/21-2029/30 Heating Seasons	<u>2021-2022 IRP</u> Actual Results for 2019-2020 Heating Season
Utah GS	99.7–91.9	101.1–92.9	101.5
Utah Residential GS	78.0–73.6	78.4–73.6	79.2
Utah Commercial GS	417.6–386.8	424.4–390.1	418.2

Table 6. Natural Gas Supply Requirements (MMDth)
(2021-2022 IRP at Pages 14-4:14-6, Exhibit 14.90, 2020-2021 IRP at Pages 13-4:13-6, Exhibit 13.90)

Natural Gas Supply Requirement	<u>2021-2022 IRP</u> Forecast for June 2021–May 2022	<u>2020-2021 IRP</u> Forecast for June 2020–May 2021
Purchased Gas	60.1	50.6
Other (storage)	14.4	16.1
Cost-of-Service Gas	58.4	63.0
Off-System	0.5	0.5
Total	133.4	130.2

Note: Actual cost-of-service gas supply for the 2020 calendar year was 65.0 MMDth measured at the wellhead compared to 71.8 MMDth during the 2019 calendar year.⁶

The 2021-2022 IRP discusses the planning, designing, and building of several reinforcement and replacement projects or programs, including fourteen high-pressure station projects, three feeder line projects—one of which is its Utah Feeder Line Replacement Program—and two intermediate high-pressure programs.⁷ The IRP describes the southern system

⁶ 2021-2022 IRP at 9-2.

⁷ DEU’s two intermediate high-pressure programs are the Belt Main Replacement program and the Aging IHP Infrastructure Replacement (Not Included in the Infrastructure Rate Adjustment Tracker) program.

expansion project currently in development, the on-system LNG facility project, and DEU's rural expansion plans. DEU also reports that its transponder replacement project was completed in the first quarter of 2021, and that it will transition to a regular transponder maintenance program.

DEU provides summaries of its cost tracking programs and discusses industry and market trends. It provides additional details on how the increased use of natural gas as a source to generate electricity is raising forecasted gas prices, and provides an update on clean energy regulation, LNG exports, pricing trends, production trends, storage, and sustainability trends in the Industry Overview section. In the Effects of COVID-19 section, DEU states that while total gas usage decreased due to COVID-19, substantial customer growth helped offset those declines and anticipates that strong customer growth will last for a few years. Finally, DEU offers updates on price stabilization, its energy efficiency programs, various sustainability initiatives DEU has started, and final modeling results.

PARTIES' COMMENTS

DPU and OCS recommend acknowledgment of the 2021-2022 IRP

Though DPU and OCS make recommendations for improvements to future IRPs, both ultimately recommend the PSC acknowledge the 2021-2022 IRP. While DPU expresses some remaining concerns with parts of the IRP, it states that the "IRP guidelines have been sufficiently met."⁸ OCS recommends the PSC acknowledge the 2021-2022 IRP but require DEU to implement specific future improvements.

⁸ DPU Comments, at 19.

DPU Comments and Recommendations

DPU indicates that DEU fulfilled its commitments to (1) include a “Supply Reliability” section to provide updates about DEU’s LNG project and discuss any other supply reliability concerns, (2) provide updates in the quarterly variance reports on how the pandemic was affecting DEU, (3) provide additional details in quarterly variance reports regarding any management decision to override recommendations from the SENDOUT model, (4) provide additional details in the Sustainability and Long-Term Planning Sections of future IRPs, and (5) include summaries of stakeholder meetings in future IRPs and IRP-related technical conferences.⁹ DPU states that instances in which management decided to override the SENDOUT model in the 2021-2022 IRP lacked detail, as did the Long-Term Planning section, but concludes that DEU substantially fulfilled the commitments it made and as recognized in the PSC’s order acknowledging DEU’s 2020-2021 Integrated Resource Plan (“2020-2021 IRP”).¹⁰

In addition, DPU states that it remains concerned about the Design Peak-Day forecast by heating system and its applicability to the IRP process.¹¹ It also expresses concern that even minimal alterations to DEU’s models can dramatically change the results, which could provide the opportunity to change inputs to achieve a specific result.¹² DPU continues to assert that DEU is not providing enough detail regarding any management decision to override the SENDOUT

⁹ DPU Comments, at 5-6.

¹⁰ See *Dominion Energy Utah’s Integrated Resource Plan for Plan Year: June 1, 2020, to May 31, 2021*, Docket No. 20-057-02, Order, issued January 5, 2021 (“2020-2021 IRP Order”).

¹¹ DPU has raised this issue in prior IRPs. For example, in its comments related to DEU’s 2020-2021 IRP, DPU stated, “[o]n an overall basis, there is roughly a 30% cushion between the highest use and the estimated peak day. This equates to a margin of security when [DEU] uses Design-Day in modeling and designing its system. [DPU] has raised this issue previously and is still concerned about how it is used and relevant applicability.” (Exhibit 3.9.) *Id.*, at p. 6, filed September 1, 2020.

¹² DPU Comments, at 16-17.

model and mentions the time when DEU hesitated to initiate production shut-ins during the COVID-19 pandemic, as an example. DPU states it would have liked to see a discussion on the financial impact that DEU's hesitation had on customers.¹³

DPU also discussed the 2021-2022 IRP's gas lost and unaccounted-for report, Design Peak-Day demand forecast method, DEU's Joint Operating Agreement (JOA) with DEQP, certain gate station and high pressure projects, and rural expansion.¹⁴ In addition, DPU discussed federal regulations pertaining to DEU's integrity management program, adoption of a corporate policy related to environmental justice, management of cost-of-service gas, DEU's LNG facility project and its initial availability, DEU's sustainability goals, DEU's energy efficiency programs, and DEU's final modeling results.¹⁵ Finally, it discussed circumstances under which DEU can override its SENDOUT model, DEU's attempt to further stabilize winter prices by entering fixed priced options, and DEU's increased gas hedging program described in supplemental information filed with parties to this docket in September of 2021.¹⁶

Consistent with its comments, DPU recommends that DEU include more detailed information related to any management decision to override the SENDOUT modeling recommendations and provide additional details in the Long-Term Planning and Sustainability Section. DPU also recommends that: (1) DEU include first- and second-party damages that cause lost and unaccounted for gas in the IRP, (2) DEU work with regulators to incorporate the gate station capacity study it conducts with DEQP each year into the IRP, (3) DEU include total miles

¹³ *Id.*, at 13-14.

¹⁴ *Id.*, at 7-11.

¹⁵ *Id.*, at 11-17.

¹⁶ *Id.*, at 17-18.

assessed, not just High Consequence Area miles, (4) DEU include a summary of the previous year's IRP quarterly variance reports, and (5) DEU include the results of its interruption analysis in the IRP.¹⁷

In reply, DEU agrees with DPU's position that the 2021-2022 IRP generally complies with the applicable IRP guidelines and PSC orders.¹⁸ DEU states that it is willing to provide additional information in future IRPs regarding: (1) management decisions to override the SENDOUT model, (2) the long-term planning section, (3) the interruption analysis DEU conducts, (4) gate station analysis, (5) integrity management, (6) final modeling results, and (7) hedging discussions.¹⁹ In response to interest expressed by DPU about DEU's JOA with DEQP, DEU commits to updating interested parties and the PSC of any changes that may happen once DEQP is sold.²⁰

OCS Comments and Recommendations

OCS discusses DEU's compliance with its commitments under the 2020-2021 IRP Order,²¹ and its gas hedging program described in supplemental information filed in September 2021.²²

OCS states that DEU fulfilled its commitments to include a "Supply Reliability" subsection in the 2021-2022 IRP to provide updates on the LNG project and on the quarterly

¹⁷ *Id.*, at 7, 9, 12, 14, and 9, respectively.

¹⁸ DEU Reply Comments, at 2.

¹⁹ *Id.*, at 3-5, 8, and 9-11.

²⁰ Since DEU filed reply comments, DEQP was sold.

²¹ See *Dominion Energy Utah's Integrated Resource Plan (IRP) for Plan Year: June 1, 2020 to May 31, 2021*, Docket No. 20-057-02, Report and Order, at 9-10, issued January 5, 2021 ("2020 IRP Order").

²² OCS Comments, at 1.

variance reports on how the pandemic was affecting DEU.²³ OCS further states that DEU mostly fulfilled its commitment to provide additional details in quarterly variance reports regarding any management decision to override recommendations from the SENDOUT model, and indicated that “[t]here was no mention of overriding the SENDOUT model in the Quarterly Variance Reports.”²⁴ It also asserted the IRP lacked details in the Sustainability and Long-Term Planning Sections of future IRPs and in the summaries of stakeholder meetings and technical conferences, indicating that it had mentioned the same concern with respect to the 2020-2021 IRP.²⁵

OCS discusses DEU’s gas hedging strategy, including its procurement of 80,000 Dth/day of additional first-of-month fixed price gas for the 2021-2022 heating season.²⁶ OCS asserts that the additional gas contracts decrease DEU’s exposure to daily price and spot price gas, and that it supports DEU’s continued supply hedging efforts.²⁷ OCS states that it appreciates DEU’s collaboration with DPU and OCS to protect customers from a potential high cost gas event.²⁸

OCS recommends, similar to DPU, that DEU provide additional information and detail in the Long-Term Planning Section, and for DEU to include whether or not the SENDOUT model was overridden in each variance report.²⁹ OCS also recommends that DEU include more information and analysis throughout the IRP document for significant topics presented in IRP technical conferences.³⁰

²³ *Id.*, at 2.

²⁴ *Id.*, at 3.

²⁵ *Id.*, at 4.

²⁶ *Id.*, at 5.

²⁷ *Id.*, at 7.

²⁸ *Id.*

²⁹ *Id.*

³⁰ *Id.*

In reply, DEU agrees with OCS that the 2021-2022 IRP generally complies with the applicable IRP guidelines and PSC orders.³¹ DEU states that it is willing to provide additional information in future IRPs regarding: (1) any management decision to override the SENDOUT model, (2) the long-term planning section, (3) information provided in IRP technical conferences, and (4) hedging discussions.³²

Disagreements related to Future IRP Filings

The DEU Reply Comments state that DEU disagrees with DPU's recommendation that the IRP should report on lost and unaccounted for gas related to first- and second-party damages since DPU already receives that information outside of the IRP process, and that first- and second-party damages represent just over two percent of total damages.³³ DEU asserts that, considering the PSC's extensive review of DEU's Design Peak-Day calculation in Docket Nos. 19-057-13 and 17-057-09, no change to that calculation is warranted at this time.³⁴ In addition, DEU argues that a summary of variance reports related to a previous IRP would not be beneficial considering the IRP is forward looking.³⁵ DEU also states that past variance reports can be found on the PSC's website and that including a summary of them in the IRP would be duplicative.³⁶

Ultimately, DPU and OCS each recommend that the PSC acknowledge DEU's IRP as complying with the Standards and Guidelines but urge the PSC to require DEU to make improvements recommended by them in future IRP proceedings.

³¹ DEU Reply Comments, at 2.

³² *Id.*, at 3, 5, 10, and 11, respectively.

³³ *Id.*, at 6.

³⁴ *Id.*, at 6-7.

³⁵ *Id.*, at 10.

³⁶ *Id.*

II. DISCUSSION, FINDINGS OF FACT, AND CONCLUSIONS OF LAW

DEU's IRP process is an open, public process through which all relevant supply and demand-side resources are investigated on a systematic, consistent, and comparable basis. The results of this investigation guide DEU in the selection of an optimal set of resources to meet its current and future natural gas service needs at the lowest total cost (to the utility and its customers), in a manner consistent with the long-run public interest and safety, given the expected combination of costs, risks, and uncertainty.

The PSC reviews DEU's annual IRP for compliance with the Standards and Guidelines, including the information presented in the IRP and the adequacy of DEU's IRP process. Specifically, DEU's 2021-2022 IRP includes the required reporting requirements in the form prescribed in the Standards and Guidelines, and contains extensive general information and 191 Account-related information and analyses, and distribution non-gas (DNG)-related information and analyses. It also includes the information DEU agreed, and committed, to provide in subsequent IRPs, most recently in its reply comments related to the 2020-2021 IRP and IRP process, which we acknowledged in our 2020 IRP Order, as recognized by both DPU and OCS.

For example, DPU indicated that its "comments ... focus[ed] ... namely [on] 1) ... whether [DEU] fulfilled its commitments as required in the [PSC]'s 2020 IRP [O]rder ...; 2) ... certain topics discussed in the current IRP; and 3) the supplemental information filed in September 2021."³⁷ DPU concluded that "[e]xcept for [DPU]'s interpretation of the term 'more information' in the Long-Term Planning section ..., and the lack of detail provided when [DEU]

³⁷ DPU Comments, at 4-5.

overrides the SENDOUT model ..., [DEU] has substantially fulfilled its commitments and [PSC] order to include the ... information in its 2021 IRP.”³⁸ Similarly, OCS focused its review on “[c]ompliance with [the] PSC[’s] Order [in] last year’s IRP ... [and] DEU’s 2021 Supplemental Filing on Gas Supply Hedging[,]”³⁹ concluding and recommending that “the PSC acknowledge DEU’s 2021[-2022] IRP[.]”⁴⁰

Based on the foregoing, and on the DPU Comments and the OCS Comments and their respective recommendations, DEU’s agreement and commitment to make the recommended improvements, and considering the lack of any opposition, the PSC acknowledges that DEU’s 2021-2022 IRP substantially complies with the Standards and Guidelines.

Though some disagreement remains, the PSC finds that DEU made reasonable and satisfactory clarifications and commitments in its reply comments pertaining to DPU’s and OCS’s recommended improvements. We appreciate DEU’s commitments to making them. In addition, the PSC finds that DEU’s positions in reply comments regarding Design Peak-Day demand forecast by heating season, variance reports, and lost and unaccounted for gas are reasonable, and we therefore decline to adopt any DPU and OCS recommendations related thereto. Finally, the PSC finds that DEU’s commitment to keep interested parties updated on any developments related to the JOA with DEQP is also reasonable.

³⁸ *Id.*, at 6.

³⁹ OCS Comments, at 1.

⁴⁰ *Id.*, at 7.

ORDER

Based on the foregoing:

- (1) We conclude the 2021-2022 IRP, as filed, generally complies with the Standards and Guidelines.
- (2) We recognize DEU's commitments to:
 - a. include additional details related to any management decision to override the SENDOUT model in future IRP variance reports and include a summary of the events in the annual IRP filing;
 - b. include a subsection labeled "Long-Term Planning" within the "System Capacity and Constraints" section of the IRP;
 - c. keep interested parties updated with regards to the JOA DEU has with DEQP;
 - d. provide a summary of the interruption analysis conducted in future IRPs;
 - e. provide additional information regarding gate stations in future IRPs;
 - f. include Total Miles Assessed under the Integrity Management section in future IRPs;
 - g. explain the impact of changes DEU initiates to its modeling in future IRPs;
 - h. provide greater detail about material discussed in IRP Technical Conferences in future IRPs; and

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- i. review the results of its hedging program and provide a proposal for the future of the program in a 2022 IRP Technical Conference.

DATED at Salt Lake City, Utah, January 7, 2022.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Ron Allen, Commissioner

Attest:

/s/ Gary L. Widerburg
PSC Secretary
DW#321865

Notice of Opportunity for Agency Review or Rehearing

Pursuant to Utah Code Ann. §§ 63G-4-301 and 54-7-15, a party may seek agency review or rehearing of this order by filing a request for review or rehearing with the PSC within 30 days after the issuance of the order. Responses to a request for agency review or rehearing must be filed within 15 days of the filing of the request for review or rehearing. If the PSC fails to grant a request for review or rehearing within 30 days after the filing of a request for review or rehearing, it is deemed denied. Judicial review of the PSC's final agency action may be obtained by filing a Petition for Review with the Utah Supreme Court within 30 days after final agency action. Any Petition for Review must comply with the requirements of Utah Code Ann. §§ 63G-4-401, 63G-4-403, and the Utah Rules of Appellate Procedure.

CERTIFICATE OF SERVICE

I CERTIFY that on January 7, 2022, a true and correct copy of the foregoing was delivered upon the following as indicated below:

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