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## UTAH DEPARTMENT OF COMMERCE

### Division of Public Utilities

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## Action Request Response

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Chris Parker, Director  
Artie Powell, Manager  
Doug Wheelwright, Utility Technical Consultant Supervisor  
Eric Orton, Utility Technical Consultant

**Date:** June 24, 2022

**Re:** **Docket No. 21-057-24**, Dominion Energy Utah's Snow Shelter Inspection and Placement Progress Report: Request of The Division of Public Utilities for Enforcement Action Under the Natural Gas Pipeline Safety Act Against Dominion Energy.

## Recommendation (Acknowledge)

The Division of Public Utilities (Division) has reviewed the Dominion (Dominion or Company) "Inspection and Placement of Snow Shelters in High Snowfall, Accelerated Assessment Areas" (Report). The Division has reviewed the Report and has determined that it contains the required information as ordered and recommends that the Public Service Commission of Utah (Commission) acknowledge the Report. No further action is required at this time. While Dominion's Report is only one step in fulfilling the commitments agreed to in the Settlement Stipulation, Dominion is making progress to fulfill its obligations. The Division will continue to monitor this program and subsequent reports from the Company.

## Issue

Dominion filed its Snow Shelter Inspection and Replacement Report as agreed to in the Settlement Stipulation. In approving the Settlement Stipulation, the Commission found that

Division of Public Utilities

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“the inspection and reporting schedules outlined in the Settlement are reasonable.” This filing is Dominion’s second Report for this program.

## **Background**

On October 1, 2021, Dominion filed a Motion to Approve Joint Stipulation and Request for Scheduling Conference. The Settlement Stipulation resolved a Division-filed Request for Enforcement Action as a result of an incident that occurred on February 16, 2019. On October 13, 2021, the Commission issued its Scheduling Order and Notice of Virtual Hearing. On December 14, 2021, the Commission held a virtual hearing and both filing parties provided testimony supporting the Settlement Stipulation. On January 20, 2022, the Commission issued its Order Approving the Settlement Stipulation (Order).

On January 27, 2022, Dominion filed its first report and outlined the progress made toward inspecting meters that may need Snow Shelters. The Company also reiterated its commitment to file this type of report on a quarterly basis going forward. The Division filed a responsive memo and on March 2, 2022, the Commission issued an Acknowledgement Letter stating that it “acknowledges the Snow Shelter Report as complying with the requirements described in the Order.”<sup>1</sup>

On May 25, 2022, Dominion sent the second Report updating the progress toward inspecting structures and placing Snow Shelters. This Report represents the progress made through April 19, 2022. Also on that day, the Commission issued its Action Request directing the Division to review for compliance and make a recommendation on or before June 24, 2022. This memo provides the Division’s Action Request Response and recommendation.

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<sup>1</sup> Acknowledgement Letter from the Commission, March 2, 2022.

## Discussion

The Settlement Stipulation contains several commitments designed to improve safety and to help prevent an incident similar to what occurred on February 16, 2019,<sup>2</sup> from happening in the future. These commitments include:

- (1) updating its Standard Practices for placement of meters and snow shelters;
- (2) applying the new and updated Standard Practices to future meter installations;
- (3) submitting changes to its tariff for Commission approval, within sixty days of the Order; and
- (4) updating its Operator Qualification Program relating to Snow Shelters and their need when determining the placement of its meters.

Dominion is required to provide information to the Division and Commission “related to meter snow shelters, including quarterly reports detailing its progress inspecting the remaining structures and snow shelter placements” and to inform regulators once all inspections have been completed. Dominion will also include an additional step in its regular five-year meter inspection cycle directed at determining whether snow protection is necessary. Finally, Dominion agreed to “contribute \$100,000 at shareholders’ expense to help cover the costs for the installation of new snow shelters.”<sup>3</sup>

In this filing, Dominion provides the second quarter results of its meter inspections in Park City, Ogden Valley, Brian Head, and Cedar Highlands (areas more likely to experience high snowfall) as of April 19, 2022. This Report shows the following:

- Dominion employees inspected 6,725 meters in the above-mentioned areas to determine if a Snow Shelter is needed over those meters. This number is the same as the last report.
- There are currently 1,903 Snow Shelters protecting the existing meters. This also has not changed since the last report.

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<sup>2</sup> Order Approving Settlement Stipulation, January 20, 2022, Paragraph 1.

<sup>3</sup> Settlement Stipulation, October 1, 2021, Paragraph 19.

- There are an additional 2,196 meters that need Snow Shelters installed. This likewise has not changed since the last report.
- Of the 2,196 new Snow Shelters that need to be installed, Dominion has already installed 855 Shelters. This is the crux of the report which shows that 117 more Snow Shelters have been installed since the last quarter's report and, at the current rate it'll take nearly three years to complete the project. See the chart below.

Snow Shelter Installation Progress Report		
Installed	117	# Installed as of 1/10/20 compared to the # installed as of 4/19/22 – approximately 1 quarter
Workdays per quarter	60	20 per month X 3 months
Installs per day	1.95	Average installs per workday
Remaining	1,341	# Remaining as of 4/19/22
Workdays remaining at current rate	687.69	# Remaining / installs per workday
Quarters remaining at current rate	11.46	Workdays remaining / workdays per quarter (687.69/60)
Estimated completion time	2 3/4 years	Quarters remaining / quarters per year (11.46/4=2.86)

- Of the 1,341 Snow Shelters that need to be installed, Dominion plans to install 1,303 which is 119 less than it reported last quarter. This equates to the 117 mentioned above plus two which were in the “# Cust. Objects” column.
- There are six Snow Shelters that Dominion expects customers to self-install, however, there has been no progress on the customers self-build Snow Shelters during the past quarter. The Division had hoped that at least some would have been completed. Dominion assured the Division that all six will be “installed by September 2022”.
- 30 customers object to having a Snow Shelter installed to protect their meter (two less than the last report) and Dominion's plans to address the objections of these customers. In the previous Action Request Response the Division stated that it “will comment on this in future filings should the need arise.” As warranted by that commitment, the Division notes that in this past quarter's report Dominion agreed “to re-assess in snow and ice conditions” noting that “Immediate action will be taken if necessary. They may choose to install their own shelter or have one installed by

Dominion but there will be a specified timeframe for action” Since that commitment was made in January 2022, there has been time for a “wintertime assessment” to determine “that a snow shelter is needed” or not and that “Immediate action” could have been taken had it been required. The Division pursued this with Dominion and was informed that “due to below-average snowfall there was no immediate hazard.” Therefore, the situation was averted this year. The Company has also committed that “Any required snow shelters will be installed by the end of November 2022, pursuant to the stipulation of the parties in Docket No. 21-057-24.” This fixed date gives Dominion from April 19, 2022 (the date of the current report) through November 30, 2022 (the date of its commitment) to complete the remaining installation. That is less than seven months or just over two quarters (see the chart above for a comparison).

The current Report provides the information in the same format as the initial Report, albeit showing much slower progress than the Division expected. The Division has reviewed the filing and finds that the Company is complying with the Commission’s order in reporting the information.

## **Conclusion**

The Division recommends the Commission acknowledge Dominion’s Snow Shelter Inspection and Replacement Report. This filing satisfies one part of the Settlement Stipulation agreement and Commission’s Order. The Division notes that the objective of this program is to enhance customer safety and to help ensure that snow shelters will be installed in all locations that should have snow shelters. The Division will continue to monitor Dominion’s compliance with its obligations under the Settlement Stipulation and the Commission’s Order. Therefore, the Division recommends the Commission acknowledge the Report as compliant. This filing is not requesting any change in the Company’s current rates.

cc: Kelly B. Mendenhall, Dominion Energy Utah  
Michele Beck, Office of Consumer Services