UTAH DEPARTMENT OF COMMERCE
Division of Public Utilities

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Memorandum

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director
Brenda Salter, Assistant Director
Abdinasir Abdulle, Utility Technical Consultant Supervisor
Jeff Einfeldt, Utility Technical Consultant
Trevor Jones, Utility Technical Consultant

Date: March 13, 2024

Re: **Docket No(s). 21-057-28, 22-057-08, and 22-057-16,** Division of Public Utilities' Audit of Dominion Energy Utah's 191 Account for Calendar Year 2022

Recommendation (Approval)

The Division of Public Utilities ("Division") has completed its review of Dominion Energy Utah's ("DEU") Account No. 191.1 of the Uniform System of Accounts ("191 Account") for the 2022 calendar year. DEU was previously known as Mountain Fuel and Questar Gas Company ("QGC") prior to the merger with Dominion Energy in September 2016. The Division recommends the Public Service Commission of Utah ("Commission") make rates final in Dockets Nos. 21-057-28, 22-057-08, and 22-057-16. The completion of the 191 audit also allows for the finalization of the Transportation Imbalance Charge ("TIC") rates for the year 2022.

Issue

In Docket Nos. 21-057-28, 22-057-08, and 22-057-16 the Commission ordered approval of rates on an interim basis until such time the Division completed an audit of the 191 Account. The objective of our audit is to determine whether the costs included for recovery in the 191 Account are materially correct, appropriate, and comply with previous orders[1] issued by the

[1] Commission's previous orders regarding the 191 Account is described in the "Background" section of this memorandum.

Commission; in short, whether the costs were prudently incurred, leading to just and reasonable rates. The Division's audit[2] includes a detailed review of the various cost elements included in the 191 Account, except for those costs incurred under the Wexpro Stipulation and Agreement ("Wexpro Agreement"), and the Wexpro II Stipulation and Agreement ("Wexpro II Agreement"). The costs incurred under the two Wexpro Agreements are currently examined and reported upon by an independent certified public accounting firm appointed as the accounting monitor.

This memorandum reports and summarizes the results of the Division's audit of the 191 Account for the 2022 calendar year. The Summary of the 191 Account Audit Procedures and Results for calendar year 2022 is attached to this memorandum as Exhibit A. In addition to Exhibit A, the following confidential third-party monitoring reports are attached as Exhibits B and C: Exhibit B – Wexpro HydroCarbon Monitor Report 2022 (CONF) and Exhibit C – Wexpro Accounting Monitor Report 2022 (CONF), which help to form the basis of the Division's conclusion and recommendation.

Background

In Docket No. 78-057-13, the Commission authorized Mountain Fuel Supply Company (now Dominion Energy Utah) to implement a purchase gas balancing account through Account 191. The 191 Account provides for pass-through recovery of natural gas and related costs in which the risk of changes in costs is borne by ratepayers.

The 191 Account consists of two components: a gas commodity cost and a Supplier Non-Gas Cost. Gas commodity costs include purchase gas costs offset by other revenues and Wexpro related costs and revenues associated with Company-owned gas. Supplier Non-Gas Costs include transportation, gathering, and storage.

In addition, the 191 Account contains other gas-related expenses as ordered by the Commission. Other gas-related expenses currently allowed recovery through the 191 Account include gas supply litigation costs (Docket No. 95-057-21), the carrying cost of

[2] In using the term "Audit" the Division notes that it did not conduct an independent audit as defined and conducted under Generally Accepted Auditing Standards as promulgated under the Auditing Standards Board of the American Institute of Certified Public Accountants. In this instance, "audit" means compliance review.

working storage gas (Docket Nos. 93-057-01 and 01-057-14), hedging costs (Docket Nos. 00-57-08 and 00-057-10), and bad debts related to commodity and supplier non-gas costs (Docket No. 01-057-14).

Discussion

The Division conducted an audit of the 191 Account for the calendar year of 2022. During the audit, the Division reviewed pass-through filings and the applicable interim rates. The applicable interim rates applied during 2022 were filed in pass-through Docket Nos. 21-057-28, 22-057-08, and 22-057-16. The Division finds that costs in the 191 Account comply with Commission approved calculations and are just, reasonable, and in the public interest. The Division recommends finalizing the applicable rates.

The Division also reviews the TIC each year. The Docket Nos. 22-057-09, 22-057-17, and 22-057-21, linked to the TIC, can now be finalized following the completion of the 191 audit.

Conclusion

The Division finds that costs in the 191 Account are just, reasonable, and in the public interest. The Division recommends the Commission make rates final in Docket Nos. 21-057-28, 22-057-08, and 22-057-16. Also, the TIC rates for 2022 can now be finalized.

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