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Attorney for Dominion Energy Utah

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

)	
)	
IN THE MATTER OF THE MODIFICATION)	Docket No. 21-057-T04
OF DOMINION ENERGY’S TARIFF TO)	
THE MANUAL METER READING)	APPLICATION
CHARGE)	
)	

Pursuant to Utah Code Ann. § 54-4-1 *et seq.* and Utah Admin Code § R746-405-2, Dominion Energy Utah (Dominion Energy or Company) respectfully requests the Utah Public Service Commission (Commission) approve changes to Section 2.02 of the Company’s Utah Natural Gas Tariff No. 500 (Tariff) to assess the currently-effective \$20 per month manual meter reading fee upon customers who fail to provide the Company access to their meters for transponder replacements and other maintenance. The Company believes that the imposition of this additional cost will incent customers to provide the Company with access to difficult-to-reach meters when the Company requires it.

The Company has recently completed its transponder replacement program under which it has replaced nearly all of the Elster transponders on its system with Itron meters. This program is more fully explained in Docket No. 19-057-25. A copy of the Company’s

final Transponder Replacement Program quarterly update is attached hereto as DEU Exhibit 1.1.

DEU Exhibit 1.1 shows that the Company had completed nearly all of the planned transponder replacements, but that 37 have not been replaced due to access issues. Despite the Company's repeated attempts to gain access to these customers' premises to replace the transponders, it has been unsuccessful. The customers' failure to provide access has prevented the Company from replacing the transponders. The Company is also concerned that customers with difficult-to-access meters may fail to provide access for other maintenance work in the future.

Though the existing Tariff language *does* require customers to provide the Company with access, the Company's remedy when a customer fails to do so is limited to discontinuance of service. Rather than immediately commencing shut-off procedures against customers who fail to provide access to Company equipment, the Company proposes to impose a \$20 monthly fee upon customers who do so as an interim step. The Company believes that the imposition of this fee will incent customers to provide access, without the immediate threat of loss of service. In a rare case where the fee does not prompt a customer to provide access within a reasonable period of time, then Company could commence shut off procedures under other sections of the Tariff. Therefore, the Company proposes the Tariff change reflected DEU Exhibit 1.2 to impose a monthly charge on customers who do not promptly provide access to their meters.

The proposed Tariff change will not affect any other present rates or charges, nor does it constitute a violation of a state law or Commission rule. Approval of this Application is just, reasonable and in the public interest.

The Company requests that the Commission approve the proposed Tariff change with an effective date of June 11, 2021.

DATED this 12th day of May, 2021.

Respectfully submitted,

DOMINION ENERGY UTAH



Jennifer Nelson Clark (7947)
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Application was served upon the following by electronic mail on May 12th, 2021:

Patricia E. Schmid Justin C. Jetter Assistant Attorney Generals 500 Heber M. Wells Building 160 East 300 South Salt Lake City, UT 84111 pschmid@agutah.gov jjetter@agutah.gov	Michele Beck Director Office of Consumer Services 400 Heber M. Wells Building 160 East 300 South Salt Lake City, UT 84111 mbeck@utah.gov
Robert J. Moore Assistant Attorney General 500 Heber M. Wells Building 160 East 300 South Salt Lake City, UT 84111 rmoore@agutah.gov	Chris Parker Artie Powell Division of Public Utilities 400 Heber M. Wells Building 160 East 300 South Salt Lake City, UT 84111 chrisparker@utah.gov wpowell@utah.gov

/s/ Ginger Johnson

Dominion Energy Utah
333 South State Street, Salt Lake City, UT 84145
Mailing Address:
P.O. Box 45360, Salt Lake City, UT 84145
DominionEnergy.com



May 12, 2021

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
P.O. Box 146751
Salt Lake City, UT 84114-6751

Via E-mail

Dear Commissioners:

Pursuant to the Order Memorializing Bench Ruling Approving Settlement Stipulation in Docket No. 19-0576-25, paragraph 9 of the Settlement Stipulation attached thereto, and the Order Granting Motion dated November 20, 2020, Questar Gas Company dba Dominion Energy Utah (Dominion Energy or Company) respectfully submits the final update concerning the transponder replacement program.

Paragraph 9 of the above-referenced Settlement Stipulation provides that “Dominion Questar Gas will provide quarterly updates to the Commission about the status of the transponder replacement program”, this is the sixth of such updates, and will be Dominion Energy’s final report.

Dominion Energy has completed the Transponder Replacement program. As of March 31, 2021, Dominion Energy has replaced all of the transponders that are accessible and in use, and it will not be estimating bills beyond the timeframes set forth in the applicable provisions in Dominion Energy’s Utah Natural Gas Tariff No. 500 (Tariff) and the applicable Commission Rules.

Exhibit 14 shows the Company’s progress. By March 31, 2021, there were 836 remaining to be replaced. It is important to note that Dominion Energy will *always* have some number of meters and transponders that require maintenance or replacement. The number remaining to be replaced is reflective of what the Company would typically see, absent the Transponder Replacement Program.

Of those remaining, 534 are “obstructed” meaning they are in a location or configured such that new meter configuration is required in order to install a transponder. The Company will address these meters using its standard operating procedures and guidelines. The Remaining Transponder Status pie chart in exhibit 14 shows that 141 of the meters do not have transponders. The Company has targeted these meters for first-time transponder installation. Exhibit 14 shows that 9 of the meters are commercial or industrial meters that require specialized transponders. The Company completed the installation of transponders on each of those meters during the month of April.

By the end of March, there were still 152 meters to which the Company has not gained access in order to replace the transponders. Dominion Energy has been working with customers at each of these locations to gain access to replace the transponders and during the month of April, the Company replaced all but 37 of those transponders. The Company has continued to attempt to arrange a time to replace the transponders with each of the remaining customers and will

continue to do so. As exhibit 15 shows, with the exception of a handful of customers with access issues, the Company *is not* estimating usage for these customers beyond two months and is conducting manual meter reads to ensure that the billing is accurate. The Company is also concurrently proposing a Tariff change in order to impose a charge upon customers who do not timely provide the Company with access to the meter to install a new transponder.

The Company plans to replace any remaining transponders in conjunction with its routine meter inspections. Because all meters are inspected at least every five years, all of these transponders will be replaced in due course, in at least five years (in most cases, much sooner).

We appreciate your attention to this matter. If you have any questions or concerns, please contact me.

Sincerely,

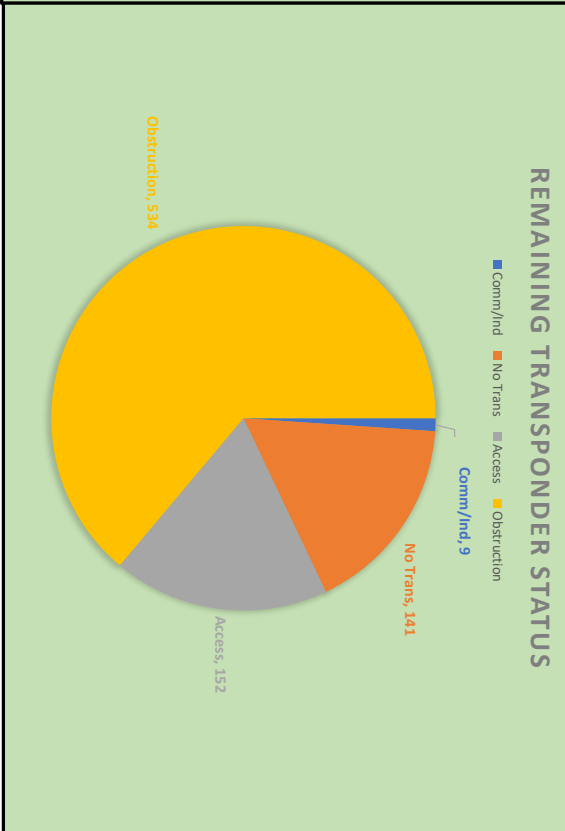
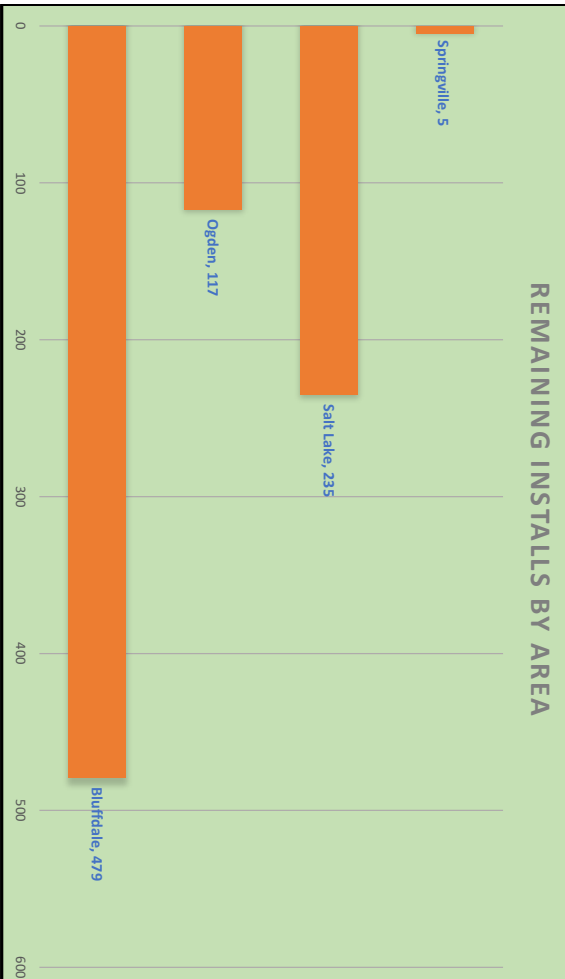
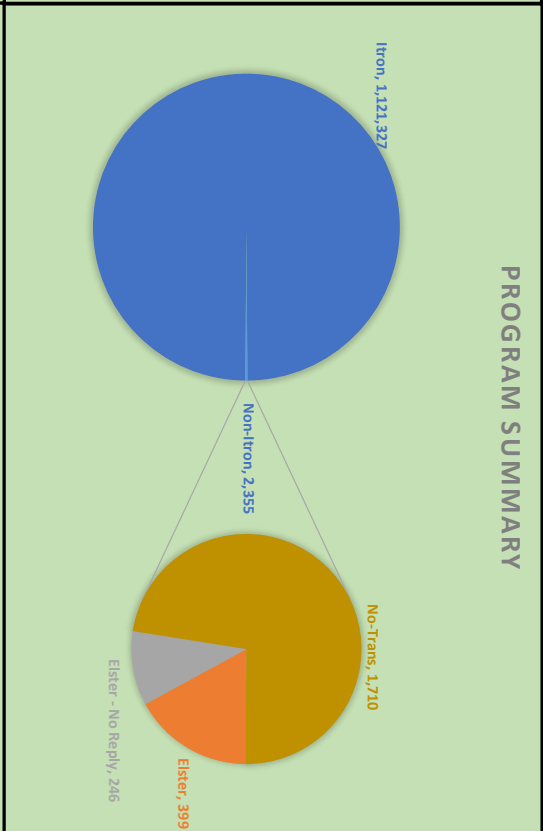
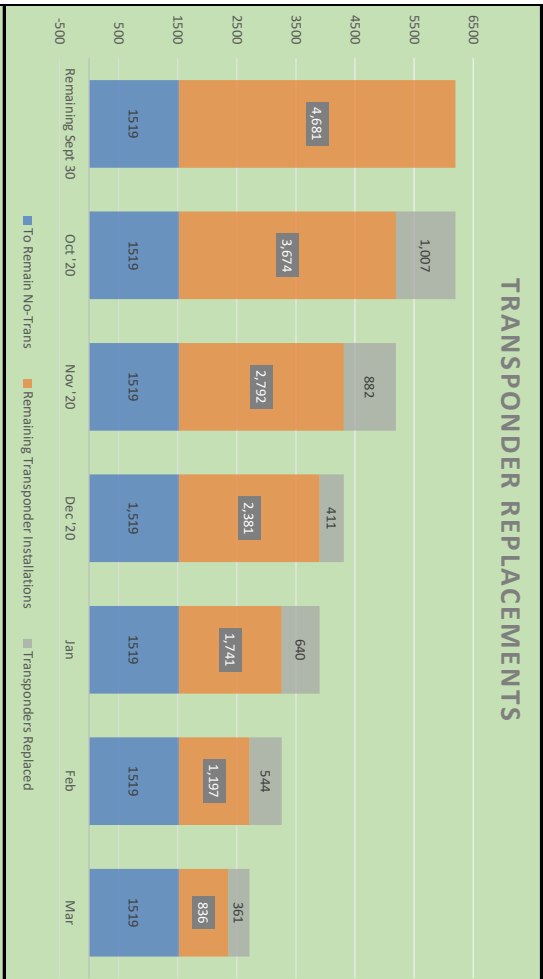
/s/ Kelly B Mendenhall

Kelly B Mendenhall
Director, Pricing and Regulation

Utah 1st Quarter 2021 Transponder Replacement Progress Report

Paragraph	Utah Stipulation	Status
6	<p>The Parties agree for purposes of settlement the Company's transponder replacement program described in the Company's Initial Filing shall be completed on or before September 30, 2020. Should the Company need to extend this deadline, it must apply to the Commission for permission to do so.</p>	<p>The Company considers the program complete.</p>
7	<p>The Parties agree for purposes of settlement that the Company will review each informal complaint received by the Division from a customer whose bill had been estimated, including any such complaints received by the Division prior to the date of this Settlement Stipulation or thereafter. If any such customers received bills for estimates exceeding six consecutive months, the Company will calculate the underbilled amount exceeding six months and, at shareholder expense, refund that amount to the customer.</p>	<p>The Company has identified nine customers whose bills had been estimated for a period exceeding six months and who filed complaints with the Division. A total amount of \$1,192.05 has been refunded to those customers at shareholders expense. See DEU Exhibit 1 of the 4th quarter 2019 report.</p>
8	<p>The Parties agree for purposes of settlement that the Commission should impose a \$500.00 penalty upon the Company. No additional penalties will be imposed for Dominion Energy's past actions or inactions identified within this Docket.</p>	<p>The Company paid the penalty on January 13, 2020. See DEU Exhibit 2 of the fourth quarter 2019 report for detail of payment.</p>
9	<p>The Parties agree that the Company will provide quarterly updates to the Commission about the status of the transponder replacement program and the extent of the estimated meter reads on its system. At the conclusion of the replacement program the Company will file a final status report with the Commission notifying the Commission and Parties that the program is complete.</p>	<p>See DEU Exhibit 14 for detail of the transponder replacement progress. As the exhibit shows, as of March 2021 there are 1,519 meters with no transponder and 836 Elster transponders remaining on the system. The remaining meters with no transponder will continue to be read manually. These meters will be read manually because either the meter location makes it cost prohibitive to install a transponder or due to the location a transponder would not be able to transmit a meter read. See DEU Exhibit 15 for a summary of the estimated meter reads on the system as of March 2021. By Commission rule the Company is required to read a meter within a two month period unless there are access issues. In March there were only 5 meters that had not been read in over two months, all of which were due to access issues.</p>

Transponder Replacement Program Dashboard Through March 2021



Total Number of Estimated Meter Reads

Months Estimated	2020												2021			
	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Sep	Oct	Nov	Dec	Jan	Feb	Mar
1	8177	10891	8302	7287	2850	2467	2021	1600	1808	1484	1051	1309	1192	1298	697	271
2	6050	4454	5831	5351	3180	925	880	745	525	649	207	257	308	163	133	40
3	5096	2791	1916	4069	3631	1579	336	471	110	148	110	86	116	47	50	2
4	1433	2043	1021	1118	2870	2518	567	154	59	70	31	48	31	13	12	1
5	147	328	666	633	339	1569	1305	138	29	5	16	13	5	5	1	1
6	23	9	6	7	12	9	6	4	1					2	1	
7	9			1	1	1	3									
8																
Grand Total	20935	20516	17742	18466	12883	9068	5118	3112	2532	2356	1415	1713	1652	1528	893	316

DOMINION ENERGY UTAH
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LEGISLATIVE RATE SCHEDULES
Exhibit 1.2
P.S.C. Utah No. 500
Affecting All Rate Schedules
and Classes of Service in
Dominion Energy Utah's
Utah Service Area

Date Issued: May 12, 2021
To Become Effective: June 11, 2021



**DOMINION ENERGY UTAH
UTAH NATURAL GAS TARIFF
PSCU 500**

2.02 GS RATE SCHEDULE

GS VOLUMETRIC RATES

	Rates Per Dth Used Each Month			
	Dth = dekatherm = 10 therms = 1,000,000 Btu			
	Summer Rates: Apr. 1 - Oct. 31		Winter Rates: Nov. 1 - Mar. 31	
	First 45 Dth	All Over 45 Dth	First 45 Dth	All Over 45 Dth
Base DNG	\$1.97299	\$0.77059	\$2.67483	\$1.47243
CET Amortization	0.03319	0.01323	0.04483	0.02488
DSM Amortization	0.20678	0.20678	0.20678	0.20678
Energy Assistance	0.01322	0.01322	0.01322	0.01322
Infrastructure Rate Adjustment	0.03673	0.01435	0.04980	0.02741
Tax Reform Surcredit 3	(0.02646)	(0.01247)	(0.03463)	(0.02064)
STEP Surcharge	<u>0.00356</u>	<u>0.00139</u>	<u>0.00482</u>	<u>0.00266</u>
Distribution Non-Gas Rate	\$2.24001	\$1.00709	\$2.95965	\$1.72674
Base SNG	\$0.37445	\$0.37445	\$0.89193	\$0.89193
SNG Amortization	<u>0.00429</u>	<u>0.00429</u>	<u>0.01022</u>	<u>0.01022</u>
Supplier Non-Gas Rate	\$0.37874	\$0.37874	\$0.90215	\$0.90215
Base Gas Cost	\$3.66269	\$3.66269	\$3.66269	\$3.66269
191 Amortization	0.22099	0.22099	0.22099	0.22099
Tax Reform Surcredit 4	<u>(0.00972)</u>	<u>(0.00972)</u>	<u>(0.00972)</u>	<u>(0.00972)</u>
Commodity Rate	\$3.87396	\$3.87396	\$3.87396	\$3.87396
Total Rate	\$6.49271	\$5.25979	\$7.73576	\$6.50285

GS FIXED CHARGES

Monthly Basic Service Fee (BSF):	BSF Category 1	\$6.75
For a definition of meter categories, see § 8.03.	BSF Category 2	\$18.25
	BSF Category 3	\$63.50
	BSF Category 4	\$420.25
Annual Energy Assistance credit for qualified low income customers:		\$79.00
For a description of the Low Income Program, see § 8.03 - Energy Assistance Fund.		

GS CLASSIFICATION PROVISIONS

- (1) Service is used for purposes such as space heating, air conditioning, water heating, clothes drying, cooking or other similar uses.
- (2) Service is subject to a monthly basic service fee.
- (3) Service is subject to Weather Normalization Adjustment as explained in § 2.05
- (4) All sales are subject to the additional local charges and state sales tax stated in § 10.01 and § 10.02.
- (5) The Energy Assistance rate is subject to a maximum of \$50 per month. The Energy Assistance rate and Energy Assistance credit are subject to § 8.03.



DOMINION ENERGY UTAH
UTAH NATURAL GAS TARIFF
PSCU 500

- (6) Customers who request removal of transponders, ~~or~~ decline automated meter reading, ~~or do not provide meter access to maintain these devices~~ will be assessed a \$20.00 per month manual meter reading fee, in addition to any other remedies available under this Tariff.

Issued by C. C. Wagstaff, Senior VP & General Manager	Advice No.	Section Revision No.	Effective Date
	<u>210-084</u>	<u>202</u>	<u>June December 31, 2021</u>

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PROPOSED RATE SCHEDULES
Exhibit 1.2
P.S.C. Utah No. 500
Affecting All Rate Schedules
and Classes of Service in
Dominion Energy Utah's
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UTAH NATURAL GAS TARIFF
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	21-04	22	June 11, 2021