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Office of Consumer Services

UTAH DEPARTMENT OF COMMERCE

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To: The Public Service Commission of Utah
From: The Office of Consumer Services
Michele Beck, Director
Bela Vastag, Utility Analyst
Alex Ware, Utility Analyst

Date: September 1, 2022

Subject: Docket 22-057-02 – Comments

In the Matter of: Dominion Energy Utah's Integrated Resource Plan (IRP)
for Plan Year: June 1, 2022 to May 31, 2023

INTRODUCTION

On June 15, 2022, Dominion Energy Utah ("DEU") filed with the Utah Public Service Commission ("PSC") its 2022-2023 Integrated Resource Plan ("IRP" or "2022 IRP"). On July 1, 2022, the PSC issued a Scheduling Order that set a deadline of September 1, 2022 for interested parties to file initial comments and October 6, 2022 to file reply comments on DEU's IRP. Pursuant to this schedule, the Utah Office of Consumer Services ("OCS") submits these initial comments on DEU's 2022-2023 IRP.

OCS COMMENTS

The OCS reviewed DEU's 2022 IRP and finds that it generally complies with the PSC's IRP Standards and Guidelines for DEU that were updated in 2009 in Docket No. 08-057-02.¹ In addition, we recognize DEU's efforts to address our and the Division of Public Utility's ("DPU") prior recommendations to improve the IRP. Therefore, we recommend that the PSC acknowledge DEU's 2022 IRP.

¹ IRP Standards and Guidelines for DEU (formerly Questar Gas Company) were first established in 1994 in Docket No. 91-057-09.

Compliance with the PSC's Order on DEU's 2021 IRP

In its Order on DEU's 2021-2022 IRP in Docket No. 21-057-01, the PSC memorialized DEU's commitments to include additional information in future IRPs. As the PSC stated in that Order: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*
- i. review the results of its hedging program and provide a proposal for the future of the program in a 2022 IRP Technical Conference.*

The OCS reviewed DEU's 2022-2023 IRP to verify whether or not DEU has met the above commitments. These commitments are the result of concerns raised by the OCS and the DPU in comments on DEU's 2021 IRP in Docket No. 21-057-01. We have identified where the 2022 IRP addresses each commitment and we believe that DEU has adequately addressed each of them.

² Docket No. 21-057-01 "Dominion Energy Utah's Integrated Resource Plan for Plan Year June 1, 2021 to May 31, 2022", January 7, 2022 Order at pages 14 - 15.

RECOMMENDATION

The OCS recommends that the PSC acknowledge DEU's 2022-2023 IRP as generally meeting the Standards and Guidelines and the Company's commitments.

cc:

Kelly Mendenhall, Dominion Energy Utah

Austin Summers, Dominion Energy Utah

Chris Parker, Division of Public Utilities

Service List