

Stephen F. Mecham (4089)  
Stephen F. Mecham Law, PLLC  
10 West 100 South, Suite 425  
Salt Lake City, Utah 84101  
Tel: 385 222-1618  
Email: sfmecham@gmail.com

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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IN THE MATTER OF THE  
APPLICATION OF DOMINION  
ENERGY UTAH TO INCREASE  
DISTRIBUTION RATES AND  
CHARGES AND MAKE TARIFF  
MODIFICATIONS

**DOCKET NO. 22-057-03**  
  
ANGC Exhibit 1R

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PREFILED REBUTTAL TESTIMONY OF CURTIS CHISHOLM, PHASE II

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The American Natural Gas Council, Inc. (“ANGC”) submits the following Prefiled  
Rebuttal Testimony of Curtis Chisholm in Phase II of this proceeding.

DATED October 13, 2022.

*/s/Stephen F. Mecham*

1 **Q. Please state your name, place of employment and position.**

2 A. My name is Curtis Chisholm. I am chief executive officer of Integrated Energy  
3 Companies and its subsidiary, Summit Energy, a member of the American Natural Gas  
4 Council, Inc. ("ANGC"). My office is located at 201 South Main Street, 20th Floor,  
5 Salt Lake City, Utah 84111.

6 **Q. Did you file Direct Testimony in Phase II of this proceeding?**

7 A. Yes.

8 **Q. What is the purpose of your Rebuttal Testimony?**

9 A. My testimony addresses the Phase II testimony filed by the DPU, the OCS, and other  
10 parties on September 15, 2022.

11 **Q. In your review of the other parties' Direct Testimony, was there anything that  
12 changed the position you supported in your own Direct Testimony?**

13 A. No.

14 **Q. What is your assessment of the September 15, 2022, Direct Testimony the other  
15 parties filed?**

16 A. Based on Table 3 of ANGC witness Tim Oliver's Rebuttal Testimony, the cost-of-service  
17 analyses the other parties presented in this phase show that Small Transportation Service  
18 ("TSS") customers are providing rates of return significantly in excess of the system  
19 average rate of return and the average rate of return for all current TS service. The results  
20 indicate the TSS class rate of return is more than 400 basis points above the system  
21 average rate of return, or at least 75% above the system average rate of return.

22 In past cases, the Commission has sought to move DEU's customer classes toward full  
23 cost of service rates. The record in this proceeding demonstrates that, despite differences

24 in parties' positions on cost allocation among rate classes, the need for greater rate relief  
25 for TSS customers is undeniable. The deviation from system average rate of return is  
26 substantial and requires a significant reduction for TSS customers in this proceeding.

27 **Q. Should the Commission approve DEU's proposal to split the current TS class into**  
28 **three separate classes?**

29 A. Yes. Splitting the current TS class into three classes (DEU's proposed TSS, TSM, and  
30 TSL) is an important and necessary step to ensure more cost-based rates and reduce  
31 existing intra-class and inter-class rate inequities.

32 **Q. Does this conclude your Phase II Rebuttal Testimony?**

33 A. Yes.

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Rebuttal Testimony of Curtis Chisholm for the American Natural Gas Council in Phase II of Docket No. 22-057-03 was served by email this 13<sup>th</sup> day of October 2022 on the following:

### QUESTAR GAS COMPANY

|                       |                                     |
|-----------------------|-------------------------------------|
| Jennifer Nelson Clark | jennifer.clark@dominionenergy.com   |
| Cameron Sabin         | csabin@mayerbrown.com               |
| Kelly Mendenhall      | kelly.mendenhall@dominionenergy.com |
| Austin Summers        | austin.summers@dominionenergy.com   |
| Ginger Johnson        | ginger.johnson@dominionenergy.com   |

### DIVISION OF PUBLIC UTILITIES

|                 |                         |
|-----------------|-------------------------|
| Chris Parker    | chrisparker@utah.gov    |
| William Powell  | wpowell@utah.gov        |
| Madison Galt    | mgalt@utah.gov          |
| Patricia Schmid | pschmid@agutah.gov      |
|                 | dpudatarequest@utah.gov |

### OFFICE OF CONSUMER SERVICES

|                 |                     |
|-----------------|---------------------|
| Michele Beck    | mbeck@utah.gov      |
| Bela Vastag     | bvastag@utah.gov    |
| Alyson Anderson | akanderson@utah.gov |
| Alex Ware       | aware@utah.gov      |
| Robert Moore    | rmoore@agutah.gov   |
|                 | ocs@utah.gov        |

### UAE

|                    |                      |
|--------------------|----------------------|
| Phillip J. Russell | prussell@jdrslaw.com |
|--------------------|----------------------|

### FEDERAL EXECUTIVE AGENCIES

|                        |                             |
|------------------------|-----------------------------|
| Maj. Holly L. Buchanan | holly.buchanan.1@us.af.mil  |
| Thomas A. Jernigan     | thomas.jernigan.3@us.af.mil |
| Capt. Marcus Duffy     | marcus.duffy.3@us.af.mil    |

### NUCOR STEEL-UTAH

|                     |                 |
|---------------------|-----------------|
| Damon E. Xenopoulos | dex@smxblaw.com |
| Laura W. Baker      | lwb@smxblaw.com |

### ASPHALT PAVEMENT ASSN.

|                    |                            |
|--------------------|----------------------------|
| Ashley Peck        | aapeck@hollandhart.com     |
| Thorvald A. Nelson | tnelson@hollandhart.com    |
| Reed Ryan          | reed@utahasphalt.org       |
| Joseph Bigler      | joebigler@bigenergyllc.com |

*/s/Stephen F. Mecham*