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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF DOMINION ENERGY UTAH FOR A WAIVER OF UTAH ADMIN. CODE. §R746-320-3 TO TEMPORARILY SUSPEND ITS METER TESTING PROGRAM	Docket No. 22-057-23 APPLICATION
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Pursuant to Utah Code Ann. §54-4-1 *et seq.*, Questar Gas Company dba Dominion Energy Utah (Dominion Energy or Company) respectfully submits this Application to the Utah Public Service Commission (Commission) and requests that the Commission waive certain portions of Utah Admin. Code §R746-320-3 and certain Commission orders (described below) to permit Dominion Energy to temporarily suspend its meter testing program, as more fully set forth herein.

BACKGROUND

Dominion Energy currently tests its meters for accuracy according to Utah Admin. Code §R746-320-3.E. As more fully set forth in Docket Nos. 78-057-12, 98-057-03, and 00-057-06. In Docket No. 78-057-12, the Company established its program of testing and repairing positive displacement meters using a statistical sampling program to determine how many meters to test each year. In Docket No. 00-057-12, the Company requested

and received Commission approval to revise its meter testing procedures to include the sampling of large meters while excluding all iron case meters from testing requirements. Finally, in Docket No. 00-057-06, the Company requested and received Commission approval to further refine its meter testing procedures to change the definition of a residential meter. Currently, the Company tests meters according to the guidelines established in the referenced dockets.

The process of meter testing occurs as follows: Dominion Energy identifies the sample of meters to be tested. For each such meter, a Dominion Energy representative goes to the meter location, connects the customer's premises to a temporary source of gas, disconnects the existing meter to be tested, and replaces the meter with another meter from inventory. That existing meter is then taken to a Dominion Energy location to have the test performed. Those meters that successfully pass the tests would be placed back into the Company's inventory for re-deployment into the system.

Dominion Energy is currently in the process of developing its testing plan for 2023. Following typical procedure, the Company would need to test around 8,000 residential meters. Of those, the Company estimates that about 5,000 will be kept in inventory for future redeployment and 3,000 will be retired due to the age of the meter. Historically, few meters test outside of the required accuracy range such that they would be retired for failure to accurately measure.

REQUEST FOR WAIVER OF UTAH ADMIN. CODE §R746-320-3.E AND

COMMISSION ORDERS

Utah Admin. Code §R746-320-3.E and the Commission orders referenced herein require Dominion Energy to test the accuracy and safety of a sample of meters according to the methods described above. Due to supply constraints of certain meters, the

Company does not have sufficient inventory of new meters to maintain its meter testing program while also keeping up with demand for meters for new construction. The Company placed orders for meters as early as its vendor allows, but the vendor cannot provide the meters until mid-2023. The Company expects that upon receipt of that inventory in mid-2023, it will be well-positioned to resume its meter testing program.

The Company therefore, requests that the meter testing program be suspended through the period of January 1, 2023 to June 30, 2023. Following the period of suspension, the Company anticipates that it will have enough new inventory of meters to resume the normal meter testing process in July. The Company proposes that it not be required to “catch up” on meters that would have been tested in the first half of the year (as that could deplete inventory). Instead, it would resume its testing program beginning in July of 2023 and the totality of 2023 testing would be about half of what it normally would have been. The Company does recognize that supply chain issues are not easy to anticipate. If it later determined that there was reason to extend this suspension period, the Company would request additional approval from the Commission.

The temporary suspension of the meter testing program will not harm customers nor increase measurement error. As mentioned previously, past experience has shown that the majority of the meters tested are within the required accuracy range.

THEREFORE, Dominion Energy respectfully requests that the Commission expressly waive Utah Admin. Code §R746-320-3.E to permit Dominion Energy to suspend the meter testing program through the period of January 1, 2023 to June 30, 2023. Following the period of suspension, the Company would resume the meter testing program. The Company further requests that the Commission act upon this Application by January 15, 2023.

RESPECTFULLY SUBMITTED this 6th day of December, 2022.

DOMINION ENERGY UTAH



Jenniffer Nelson Clark

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the Application was served upon the following persons by e-mail on December 6, 2022:

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