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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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IN THE MATTER OF DOMINION  
ENERGY UTAH'S INTEGRATED  
RESOURCE PLAN (IRP) FOR PLAN  
YEAR: JUNE 1, 2023 TO MAY 31, 2024

Docket No. 23-057-02  
  
DOMINION ENERGY UTAH'S  
REPLY COMMENTS

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Questar Gas Company dba Dominion Energy Utah (Dominion Energy or Company) respectfully submits these Reply Comments for the Utah Public Service Commission's (Commission) consideration.

**BACKGROUND**

On January 10, 2023, Dominion Energy filed its Notice of Intent to file IRP in this docket. From January through June, the Commission held a series of Technical Conferences to address various aspects of the Company's Integrated Resource Plan: Plan Year June 1, 2023 to May 31, 2024 (2023-2024 IRP). On June 26, 2023, the Commission issued a Scheduling Order setting due dates for comments and reply comments. The Commission required that comments on the 2023-2024 IRP must be submitted by Thursday, August 24, 2023, and that Reply Comments must be submitted Thursday, September 28, 2023. Scheduling Order issued June 26, 2023, Docket No. 23-057-02.

On August 24, 2023, the Utah Division of Public Utilities (Division) submitted Comments (Division's Comments) and the Utah Office of Consumer Services (Office) submitted a Memorandum addressing the 2023-2024 IRP (Office's Comments). The Company respectfully submits these Reply Comments in reply to the Division's Comments and the Office's Comments.

## **DISCUSSION**

The Company agrees with the Division's and Office's recommendations that the Commission acknowledge the 2023-2024 IRP. The Office also recommended that the Company (1) include greater detail in the Long-term Planning section of the IRP; (2) include analyses presented in technical conferences in the IRP; (3) provide updates related to its liquified natural gas plant (LNG) in each IRP; and (4) provide status updates about the transfer of ownership of MountainWest Pipeline assets to the Company, and the Joint Operations Agreement (JOA) in its Quarterly Variance Reports. The Company appreciates the Office's Comments offers the following Reply Comments in response.

### **I. More Robust Long-Term Planning**

The Office recommended that the Company incorporate more robust long-term planning into its integrated resource planning (IRP) process. Specifically, the Office recommended more robust long-term planning as it relates to price stabilization, supply reliability, and storage.

Dominion Energy Utah agrees that in future IRPs, it will enhance the long-term planning discussion regarding price stabilization, supply reliability and storage where applicable. However, it is important to note that in many cases detailed information regarding potentially available storage may not be available for long-term planning. In fact, the Company may not have information about storage availability until a time when

the storage provider issues an open-season. In these situations, the Company must evaluate the option and potentially act on the timeline outlined in the open season based on information that was not available at the time the then-current IRP was prepared. The Company will make every effort to include a more robust discussion in the long-term planning section of each IRP and will continue to diligently and prudently evaluate options as they become available.

## **II. Include Analyses Presented in Technical Conferences in the IRP Document**

The Office recommended the Company include all data and analyses presented in technical conferences in the IRP itself. The Company recognizes that doing so may be beneficial and convenient for the Commission, the Office, and other interested parties, and agrees to do so.

## **III. Provide LNG Updates**

The Office recommended the Company continue to include LNG Facility status updates in the Quarterly Variance Reports, along with the potential cost impacts of filling the facility up until the end of November 2023, and during any filling season when DEU experiences natural gas price volatility.

The Company agrees to include continue to provide a summary of gas purchase volumes, total costs, and unit costs in each Quarterly Variance Report. The Company will also provide the filling activity related to the LNG facility in each Quarterly Variance Report, in a form similar to the form it uses to provide information about its contracted storage facilities. Each Quarterly Variance Report will also include details about the Company's decision-making process for determining the timing of LNG liquefaction.

#### **IV. MountainWest Pipeline (MWP) Ownership Updates and Joint Operating Agreement Implications**

The Office also recommended the Company Provide ownership status updates on the MountainWest pipeline and possible Joint Operating Agreement implications in its Quarterly Variance Reports, at least until all issues related to the transfer of ownership are resolved.

The Company and MWP have entered into an interim services agreement to govern ongoing operations until final ownership of all interconnecting facilities has been determined and a final interconnect agreement is in place. Ultimately, the interconnect agreement between MWP and the Company will include all material items from the prior Joint Operations Agreement, including a requirement for annual system analysis and coordination. The Company anticipates that it will complete the transfer of assets and execute the new Interconnect Agreement in 2024. The Company will provide updates on the status of the transfer of assets, and the Interconnect Agreement in each quarterly Variance Report until all are completed.

#### **CONCLUSION**

Dominion Energy appreciates the thorough and thoughtful review of both the Division and the Office and the feedback they provide. The Company respectfully submits these Reply Comments as additional information for the Commission's consideration.

RESPECTFULLY SUBMITTED this 26<sup>th</sup> day of September, 2023.

DOMINION ENERGY UTAH



Jenniffer Nelson Clark

*Attorney for Dominion Energy Utah*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Dominion Energy’s Reply comments was served upon the following persons by e-mail on September 26, 2023:

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