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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

FORMAL COMPLAINT OF MARCIA DARGER d/b/a ARCHIMEDES 5 LLC AGAINST DOMINION ENERGY UTAH	Docket No. 23-057-10 DOMINION ENERGY UTAH'S WRITTEN RESPONSE TO COMPLAINT
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On June 12, 2023, Marcia Darger dba Archimedes 5 LLC (Ms. Darger) filed a formal Complaint against Questar Gas Company dba Dominion Energy Utah (Dominion Energy). On June 13, 2023, the Utah Public Service Commission (Commission) issued a Notice of Filing and Comment Period (the Notice). The Notice provided that Dominion Energy could submit a written response to Ms. Darger's Complaint by July 12, 2023. Pursuant to the Notice, Dominion Energy respectfully submits this written response.

BACKGROUND

On March 10, 2023, Ms. Darger contacted Dominion Energy to complain that her natural gas bill for Unit A located at 618 N. 2720 E., in St. George, Utah (Unit A) seemed unusually high. Ms. Darger indicated that the only appliance in use at Unit A was a relatively

new water heater. Dominion Energy requested a photograph of the gas meter. *See* DEU Confidential Exhibit A. On March 24, 2023, Dominion Energy contacted Ms. Darger and indicated that the Company’s review of the photograph and the bill showed that the meter read was accurate. *See* DEU Confidential Exhibit B. Ms. Darger indicated that after she saw the bill increase in the winter of 2023, she then turned off all of the appliances, and that there should be no usage. *Id.* Ms. Darger asked to speak with a supervisor. *Id.* The supervisor offered to conduct a high bill investigation to ensure that the meter at Unit A was properly measuring natural gas usage. *Id.*

On March 30, 2023, a Dominion Energy service technician met with Ms. Darger at Unit A. Ms. Darger provided the service technician with print-out copies of her bills for Unit A, and an adjacent unit. The technician noted a discrepancy in the sales tax rate charged for each unit and recommended that Ms. Darger contact the Company’s billing department to address the issue.¹ While on the property, the service technician replaced the meter and sent the old meter to the Company’s meter facility for testing. As part of this process, the technician painted the newly-placed meter. Painting a meter does not impair the functioning of that meter.

On May 11, 2023, the Company tested the meter it had removed from Unit A. The meter was accurately measuring, with a proof of +1.0 on the open test (full capacity) and +1.5 on the check test (20% capacity). *See* DEU Confidential Exhibit C.

¹ On April 4, 2023, Ms. Darger contacted Dominion Energy to discuss the tax issue that the technician had identified. Dominion Energy’s review showed that the unit adjacent to Unit A was billed as a “non-residential” account and Unit A had been billed at a “residential” tax rate. Dominion Energy has since rebilled the unit adjacent to Unit A at a residential tax rate, and has credited the account associated with that unit for all of the tax impact of the incorrect

Mr. Darger has provided a summary of the gas account charges for both Unit A and an adjacent unit, which are inconsistent with Company records. Accordingly, Dominion Energy provides the bills for Unit A as DEU Confidential Exhibit D. The charges shown on those bills are shown in the table contained in DEU Confidential Exhibit E.

In February 2023, Ms. Darger stopped paying the bill for Unit A, and those bills began to grow. Additionally, though Ms. Darger may have turned her appliances off in the spring of 2023, she retained a natural gas account. Accordingly, she was required to pay a basic service fee and other charges, as reflected on her bill.

On May 15, 2023, Ms. Darger filed an informal complaint with the Utah Division of Public Utilities (Division), reiterating her high bill concern. Dominion Energy responded to the informal complaint in writing. On June 12, 2023, Ms. Darger filed a formal Complaint with the Commission. Unfortunately, on that same day, her bill was set to issue a past-due notice and could not be recalled. Notwithstanding this circumstance, Dominion Energy ceased billing on the account and, to date, has made no effort to collect amounts owed pending the resolution of this docket.

DISCUSSION

Dominion Energy complied with applicable statutes, rules, regulations, and the provisions of its Utah Natural Gas Tariff No. 600 (Tariff). Utah Admin. Code §R746-320-3(F)(1), and Section 8.01 of the Tariff provide that upon written request, Dominion Energy will test a customer's meter. Though Ms. Darger did not submit a written request, the

billing back to 2021, when Ms. Darger opened the account.

Company responded to her high bill complaint promptly by removing the meter and replacing it with a new meter, and by testing the meter it had removed.

Dominion Energy conducted the meter test in accordance with Utah Admin. Code §R746-320-3(H) and Section 8.01 of its Tariff, both of which indicate that when a meter is more than three percent fast, then a customer is entitled to a refund. Here, the meter test showed that the meter at Unit A was accurately registering well below the three-percent threshold, and no refund was required.

During the period at issue, Dominion Energy billed Ms. Darger for the basic service fee and natural gas usage, as well as associated taxes and fees, in accordance with the Tariff. The appropriate charges for GS customers are detailed in Section 2.02 of the Tariff, and the taxes associated with the natural gas service are addressed in Sections 10.01 and 10.02 of the Tariff. The Company properly applied all of these charges and taxes for Unit A, and corrected the taxes erroneously applied to an adjacent unit.

Dominion Energy Utah has, at all times, acted in accordance with all applicable statutes, rules, regulations, and Tariff provisions. Accordingly, the Formal Complaint of Marcia Darger d/b/a Archimedes 5 LLC against Dominion Energy Utah should be denied.

RESPECTFULLY SUBMITTED this 12th day of July, 2023.

DOMINION ENERGY UTAH



Jenniffer Nelson Clark
Attorney for Dominion Energy Utah

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing **DOMINION ENERGY UTAH'S WRITTEN RESPONSE TO COMPLAINT** was served upon the following persons by e-mail on the 12th day of July, 2023:

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