

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION
OF DOMINION ENERGY UTAH TO
EXTEND GAS SERVICE TO GENOLA,
UTAH

Docket No. 23-057-13

DIRECT TESTIMONY OF JUSTIN I. WITHERS
FOR DOMINION ENERGY UTAH

September 8, 2023

DEU Exhibit 3.0

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I. INTRODUCTION

1
2
3 **Q. Please state your name and business address.**

4 A. My name is Justin I. Withers, and my business address is 1640 North Mountain Springs
5 Parkway, Springville, UT 84663.

6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by Dominion Energy Utah (“Dominion Energy,” “DEU” or
8 “Company”) as a Manager of Region Operations. I am responsible for overseeing the
9 Company’s distribution operations in Utah and Juab Counties.

10 **Q. Have you testified in any previous proceedings?**

11 A. No.

12 **Q. What general areas does your testimony address?**

13 A. I discuss several matters, including (1) the costs associated with converting homes to
14 utilize natural gas instead of other fuels, (2) the requirements for disposal of propane
15 tanks, and (3) the advantages of natural gas over other fuel sources.

16 **Q. Please describe your experience with the Company.**

17 A. I have been with Dominion Energy, and prior to that Questar Gas Company, for a total
18 of 29 years. I have 25 years of experience in operations for the Company. I have been
19 an operations foreman and supervisor, and I am now Manager of Region Operations.
20 During my time with the Company, I have also spent two years as a service technician,
21 two years working on natural gas facility construction, and seven years as a system
22 integrity technician.

23
24 I was one of the first employees to pilot the “operations model” in the Company.
25 Historically, employees either worked in construction services (construction of
26 company facilities) or they were service technicians providing service to customers in
27 their homes. The operations model combines these functions into what we now call
28 operations. As a result of this experience, I am knowledgeable both about construction

29 of natural gas facilities, as well as the conversion to and installation, servicing, and
30 maintenance of natural gas appliances.

31 **Q. Have you been involved in other instances where the Company expanded natural**
32 **gas service to a previously-unserved area?**

33 A. Yes. I was involved when the Company expanded natural gas service to Cedar Fort,
34 Utah in the late 1990s. In that expansion, the Company's personnel participated in
35 converting homes for the transition from propane to natural gas. During that transition,
36 I participated in installing piping into homes, setting meters, and converting all kinds
37 of appliances—from residential appliances such as furnaces, water heaters and stoves,
38 to commercial appliances and equipment—to burn natural gas. I was also involved
39 when the Company expanded service to Eureka in 2021, and Elberta and Goshen in
40 2022. At that time, I worked closely with community leaders and building inspectors
41 to ensure a pre-evaluation of customers' homes was performed to assure fuel line size,
42 combustion air, venting, and appliances were ready for natural gas.

43 **II. CONVERSION FROM OTHER FUEL SOURCES TO NATURAL GAS**

44 **Q. Please describe the process of preparing a customer's home or business to burn**
45 **natural gas instead of other fuel sources.**

46 A. The process of converting appliances and equipment to natural gas can vary depending
47 on each customer's preferences and needs. Some customers may need to convert
48 furnaces, stoves, and water heaters to be able to utilize natural gas instead of propane
49 or fuel oil. In most cases, this conversion is relatively simple. For example, converting
50 a furnace that burns propane to a natural gas furnace generally involves changing
51 orifices on each burner, installing a spring in a control valve, and setting the proper
52 outlet pressure on the burner of the appliance. There are currently conversion kits on
53 the market that a licensed contractor could provide and install. For older appliances
54 those kits could cost as little as \$15. For newer furnaces, the cost of the kits is about
55 \$300. In some cases, homes with propane-fueled appliances will have copper fuel lines
56 that will need to be replaced, because copper lines are not suitable for natural gas.
57 Natural gas fireplaces can also easily be installed to convert a wood-burning heat source

58 to a natural gas appliance.

59 For homeowners currently using coal, heating oil, or electricity to heat their homes,
60 those homes will need to be retrofitted with appropriately-sized gas fuel lines and new
61 appliances, and may need to have some ductwork installed.

62 **Q. Will the Company perform the work necessary to convert a customer's home for**
63 **natural gas consumption?**

64 A. No, the Company will not be involved in the installation of fuel lines or conversion of
65 existing appliances. Each customer would be responsible to hire a qualified contractor
66 to perform the work.

67 **Q. Can you describe the range of costs a customer might incur in making the**
68 **required changes?**

69 A. As I mentioned earlier, kits to adjust a propane-burning appliance to natural gas cost
70 between approximately \$15 to \$300 depending on the type and age of the appliance at
71 issue. The Company recommends that customers hire a qualified installer to perform
72 the work to make the conversion to natural gas. The cost to retain a contractor varies,
73 but I would suggest the customer get several estimates before committing to a particular
74 contractor. If a customer needs to replace their appliance, the cost will vary depending
75 on the appliance the customer selects. The average cost in Provo, Utah in 2023 for a
76 water heater was between \$1,500 to \$2,000, and the cost for a furnace was between
77 \$2,000 and \$2,500. Customers who need fuel lines, duct work, and venting will incur
78 additional costs that will be dependent upon the extent of work needed.

79 **Q. In your experience, are these costs significant enough to deter customers from**
80 **signing up for natural gas service?**

81 A. Generally, no. In the Cedar Fort, expansion we did not maintain statistics associated
82 with the exact number of residents who signed up for natural gas service. However, in
83 my experience in Cedar Fort, most residents chose to obtain natural gas service over
84 other available fuels even when the customers were required to pay an extension area
85 charge (EAC) or a GSS rate for service lines and mains in addition to the conversion
86 costs. Most residents signed up for natural gas service within the first year.

87 **Q. Did customers in Eureka, Goshen, and Elberta sign up for service?**

88 A. Yes. In both the Eureka and Goshen/Elberta expansion projects, 86% of the potential
89 customers have signed up for service. In these recent rural expansions, I have seen a
90 lot of customer excitement in the communities that has led to additional individuals
91 signing up for natural gas service after the system was installed. As customers see their
92 neighbors getting gas service and saving money on their energy bills, they too ask for
93 service.

94 **Q. Did those customers replace all their appliances at once?**

95 A. Not necessarily. Again, the Company did not maintain specific statistics, but my
96 experience was that many customers needed only to have the conversion kit installed
97 in their appliances. Those customers did not need to replace appliances in most cases.
98 Others had to transition from electric water heaters and propane furnaces. Some
99 customers opted to transition immediately, while others chose to adjust or replace the
100 furnace and wait to replace the water heater when it eventually failed. Still others
101 installed free standing, direct vent natural gas fireplaces to offset heating costs while
102 they budgeted for more long-term conversion or replacement costs.

103 **Q. If a customer heats with wood, does that mean their home does not have duct**
104 **work?**

105 A. Not necessarily. Some people have a propane or coal furnace and supplement that heat
106 with a wood burning stove to save money. For these customers, some duct work will
107 already exist.

108 **Q. Are there safety concerns with converting customers' homes and appliances to be**
109 **able to burn natural gas instead of propane?**

110 A. Many appliances have been manufactured, designed, tested and listed to burn both fuels
111 safely. Generally, the conversion for these appliances is safe and easily done provided
112 that customers have any modifications done by licensed, qualified contractors. If they
113 are listed as propane only, they should not be converted to natural gas for safety
114 reasons. As an additional protection, the Company will not set a meter at a customer

115 location until it has been inspected by the local municipality. This is consistent with
116 the Company's current practice.

117 **III. DISPOSAL OF PROPANE INFRASTRUCTURE**

118 **Q. When a customer converts their home or business and appliances to burn natural**
119 **gas instead of propane, what do they do with the propane tank and propane**
120 **facilities?**

121 A. The propane tank must be disconnected, and the tank and the lines removed. Many
122 customers lease the tanks from the propane provider, in which case the propane
123 provider is obligated to retrieve the tanks when they are no longer used. For those
124 customers who own their tanks, they must properly dispose of those tanks. In many
125 cases, the customer can re-sell the tank or give it to a propane supplier for use
126 elsewhere. The Company will coordinate installation of natural gas with the timing of
127 the customer's removal of the propane facilities to ensure that the customer is not
128 without a fuel source.

129 **IV. SAFETY BENEFITS OF BEING A DOMINION ENERGY CUSTOMER**

130
131 **Q. What are the benefits for customers to convert from other sources of fuel to**
132 **natural gas.**

133 A. In addition to the cost-savings discussed by Austin Summers and Mayor Larson in their
134 pre-filed direct testimonies and the efficiency of natural gas, new natural gas customers
135 will benefit from a safer and more reliable system of the kind that all Dominion Energy
136 customers enjoy.

137 **Q. Are there agencies that ensure that natural gas service is safe and reliable?**

138 A. Yes. Dominion Energy is regulated by the Utah Public Service Commission as well as
139 the Pipeline Hazardous Materials Safety Administration. Each of these agencies
140 oversees Dominion Energy's facilities and operations to ensure that they are conducted
141 safely, and with the interests of customers in mind.

142 **Q. Does Dominion Energy provide emergency services to its customers?**

143 A. Yes. Dominion Energy provides safety and emergency services. If a customer smells
144 gas, Dominion Energy will respond and ensure that the Dominion Energy-owned
145 facilities are safe and secure and will inspect a customer's premises to ensure that
146 appliances and fuel lines are also functioning properly. Dominion Energy technicians
147 also respond to CO alarms customers may have installed in their homes.

148 **Q. Is natural gas a reliable fuel source?**

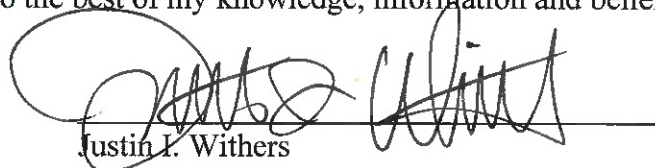
149 A. Yes. Natural gas service is typically available 24 hours a day, 365 days a year. Natural
150 gas customers do not need to worry about running out of fuel in the middle of winter.
151 They do not need to monitor the content of tanks, or worry that a tank will not be refilled
152 in time to avoid an interruption of service. Wood-burning customers must procure
153 firewood and monitor use to ensure they do not run out. Natural gas customers do not
154 have this worry, nor is there a need for an additional safety device like a low pressure
155 cutoff switch due to the consistent delivery pressure of natural gas. They can rest
156 assured that, absent something unforeseen, Dominion Energy would provide reliable
157 service every day. In some of these newer expansion areas, customers have already
158 expressed great appreciation for the access to the emergency response of Dominion
159 Energy.

160 **Q. Does this conclude your testimony?**

161 A. Yes.

State of Utah)
) ss.
County of ~~Salt Lake~~ ^{Utah})

I, Justin I. Withers, being first duly sworn on oath, state that the answers in the foregoing written testimony are true and correct to the best of my knowledge, information and belief.


Justin I. Withers

SUBSCRIBED AND SWORN TO this 7th day of September, 2023.




Notary Public