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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

FORMAL COMPLAINT OF NICOLE RAE MCLAUGHLAN LOVATO AGAINST DOMINION ENERGY UTAH	Docket No. 23-057-14 DOMINION ENERGY UTAH'S RESPONSE TO REQUEST FOR RESPONSE
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Pursuant to the Utah Public Service Commission's ("Commission") Request for Response (the "Request") issued on November 6, 2023 in this Docket, Questar Gas Company dba Dominion Energy Utah ("Dominion Energy" or "Company") respectfully submits this Response.

RESPONSE TO REQUEST

REQUEST NO. 1: Has the Complaint been resolved?

RESPONSE NO. 1: This matter has not been resolved.

Though, in Section 8 of her Reply comments dated October 12, 2023, Ms. Lovato offers a number of proposed solutions, the Company has not had direct conversations with

Ms. Lovato about the proposals, nor has it entered into any sort of settlement agreement resolving this matter.

As discussed in greater detail in Dominion Energy's October 5, 2023 Response, the Company acted, at all times, in accord with its Utah Natural Gas Tariff No. 600 ("Tariff") as well as all applicable statutes, rules, regulations and Commission orders. It reviewed Ms. Lovato's budget billing amount in the ordinary course of business, and properly calculated Ms. Lovato's budget billing amount. It is notable that while the nature of the Budget Bill program would allow for periodic and temporary over or under collections, Ms. Lovato's account is not (and has not been) over-collected. Indeed, Ms. Lovato has not paid the under-collected balance, nor has she contacted Dominion Energy to withdraw from the Budget Bill program. Ms. Lovato may choose to do so at any time, regardless of the resolution of this Docket.

In her October 12, 2023 Reply Comments, Ms. Lovato suggests that the Company modify its practice to only allow customers to enroll in the Budget Bill program in July of each year. She also suggests that the Company calculate only the "actual" rate increases. Neither approach is consistent with Section 8.05 of the Tariff. The Tariff places no restriction on the timing of enrolling in the Budget Bill program, and it contemplates the Company *forecasting* a Budget Bill customer's usage based on historic usage and anticipated rate increases. Customers who would rather be billed based upon *actual* usage need not participate in the Budget Bill program and can simply pay their natural gas bill each month. Ms. Lovato's proposal would not only require modification of the Tariff, but it would also impose requirements that are not practical or workable as the program is designed. Had Ms.

Lovato contacted the Company to offer a settlement like that proposed in her Reply comments, the Company would have declined to do so for the reasons set forth above.

RESPECTFULLY SUBMITTED this 14th day of November, 2023.

A handwritten signature in cursive script that reads "Jenniffer Nelson Clark".

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 REQUEST FOR RESPONSE** was served upon the following persons by e-mail on the 14th day of November, 2023:

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