

APPLICATION OF DOMINION)
ENERGY UTAH FOR APPROVAL)
TO MODIFY TARIFF SECTION 8.03,)
LOW INCOME ASSISTANCE/)
ENERGY ASSISTANCE RATE)

Docket No. 23-057-T04

VERIFIED APPLICATION

All communications with respect to
these documents should be served upon:

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APPLICATION
AND
EXHIBITS

September 19, 2023

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF DOMINION ENERGY UTAH COMPANY FOR APPROVAL TO MODIFY TARIFF SECTION 8.03, LOW INCOME ASSISTANCE/ENERGY ASSISTANCE RATE	Docket No. 23-057-T04 VERIFIED APPLICATION
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Pursuant to Utah Code Ann. §53-3-3 and Utah Admin. Code §R746-405-2, Questar Gas Company dba Dominion Energy Utah (Dominion Energy Utah or the Company) respectfully submits this Application for approval to modify §8.03 of the Company’s Utah Natural Gas Tariff No. 600 (Tariff). Specifically, the Company seeks the Utah Public Service Commission’s (Commission) approval of a Tariff change that clarifies the manner by which the Company identifies and includes participants in the Energy Assistance Program (Program). The Company proposes the change take effect during the August 2023 - July 2024 program period.

In support of this Application, Dominion Energy Utah states:

1. Dominion Energy Utah, a Utah corporation, is a public utility engaged in the distribution of natural gas primarily to customers in the states of Utah and Wyoming. Its Utah public utility activities are regulated by the Commission, and the Company’s rates, charges, and

general conditions for natural gas service in Utah are set forth in the Tariff. Copies of the Company's Articles of Incorporation are on file with the Commission. In addition, the Company serves customers in the Franklin County, Idaho area. Under the terms of an agreement between the Commission and the Idaho Public Utilities Commission, the rates for these Idaho customers are determined by the Utah Commission.

2. The Program commenced following the Commission's approval of the Program through its issuance of the Report and Order in Docket 10-057-08 on July 29, 2010 (Order). Since that time, the Company has been operating the Program pursuant to Tariff §8.03, which sets forth eligibility requirements for customers to be qualified for the Program. That section provides, in part: "A customer must qualify annually through the Utah Department of Community and Culture or equivalent agency, to receive the Energy Assistance credit."

3. The Utah Department of Workforce Services Housing & Community Development (DWS) currently administers this program for the State of Utah, and provides the necessary participant data to the Company on a monthly basis. DWS provides two overlapping but separate sets of data. One set of data includes all customers who are eligible to receive HEAT fund assistance (HEAT list) from the Company. The second set of data is meant to include all customers who are eligible to receive an Energy Assistance Fund credit (EA list). While similar and overlapping, these two lists are not identical. The HEAT list does not include HEAT-qualified customers who elect to receive 100% of their HEAT energy assistance through their power bill and 0% through their gas bill. The EA list is meant to include all HEAT qualified customers, including those who did not elect to receive HEAT assistance through their gas bill.

4. During the 2022/2023 program year the Company discovered that the two lists were significantly different and that the EA lists were missing a substantial number of customers that

had been included in the HEAT lists. Specifically, the HEAT lists included a total of 22,499 customers while the EA lists included a total of 13,428 customers, a difference of 9,071 customers. The Company believes this is an error. The criteria DWS uses for qualifying customers for both HEAT assistance and EA assistance are the same and can be seen on the DWS website.¹ The two lists should be largely similar.

5. Believing that the EA list was missing a substantial number of customers, the Company has reached out to DWS on several occasions about this inconsistency. On April 18, 2023, the Company noticed a discrepancy with the EA list. By May 4, 2023 the Company had completed its review of the issue and concluded that the discrepancy was not the result of a Company error. On July 18, 2023, the Company notified the HEAT program of the issue. On August 3, 2023 DWS responded stating that it would need more time to find a definitive answer. On August 25, 2023 DWS communicated that it had staffing changes on their end but was still working on an answer. On August 28, DWS again communicated that it was still working on an answer related to the discrepancy.

6. Though the Company has not received any definitive guidance from DWS regarding how long it might take to diagnose and resolve the discrepancy issue, the Company believes that the larger HEAT list is more comprehensive. The Company is concerned that using the EA list in its current state could result in a substantial number of eligible customers not receiving energy assistance credit that otherwise would be qualified according to data on the HEAT list.

7. In order to address this discrepancy in the data and to ensure that eligible customers receive assistance, the Company proposes to modify the Energy Assistance Eligibility to clarify

¹ See <https://jobs.utah.gov/housing/scso/seal/heat.html>

that it will provide the Energy Assistance Fund credit to any customer who receives HEAT assistance from the Company. Going forward the Company will rely on the monthly HEAT lists received from DWS for issuing both HEAT assistance and the Energy Assistance Credit to customers. Using this data set will maximize the number of customers who receive the Energy Assistance credit. Once DWS has diagnosed and repaired the data issue in the EW list, the Company will re-evaluate this process and consider returning to using the EW list. Any necessary revisions to the Tariff to accommodate a future process change would be brought to the Commission in a separate application at that time.

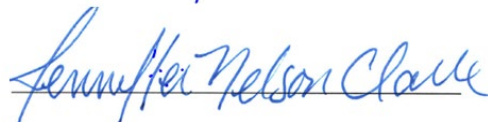
8. DEU proposes a Tariff modification, shown on DEU Exhibit 1.1 in both legislative and final form, will clarify the eligibility requirements consistent with the information contained herein. The proposed Tariff sheets change do not constitute a violation of state law or Commission rule.

WHEREFORE, Dominion Energy Utah respectfully requests the Commission approve the modifications to the Company's Tariff as described in this application, with changes to take effect during the 2023-2024 energy assistance season beginning October 15, 2023.

DATED this 19th day of September, 2023.

Respectfully submitted,

DOMINION ENERGY UTAH



Jenniffer N. Clark (7947)
Attorney for Dominion Energy Utah

VERIFICATION

STATE OF UTAH)
 :
COUNTY OF SALT LAKE)

Jordan Stephenson, being first duly sworn upon oath, deposes and states: He is the Manager Regulation of Dominion Energy Utah; he has direct personal knowledge of the matters addressed herein; he has read the foregoing Verified Application; and the statements in made in the Application are true and correct to the best of his knowledge, information and belief.



Jordan Stephenson
Manager Regulation
Dominion Energy Utah

Subscribed and sworn before me this 19th day of September, 2023.



Notary Public



CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the Verified Application was served upon the following persons by e-mail on September 19, 2023:

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