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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF ENBRIDGE GAS
UTAH’S INTEGRATED RESOURCE
PLAN (IRP) FOR PLAN YEAR: JUNE 1,
2024 TO MAY 31, 2025

Docket No. 24-057-04

ENBRIDGE GAS UTAH’S
REPLY COMMENTS

Questar Gas Company dba Enbridge Gas Utah (“Enbridge Gas” or “Company”) respectfully submits these Reply Comments for the Utah Public Service Commission’s (“Commission”) consideration.

BACKGROUND

On February 2, 2024, Enbridge Gas filed its Notice of Intent to file its 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, 2024 to May 31, 2025 (“2024-2025 IRP”). On June 14, 2024, the Company filed its 2024-2025 IRP. On June 27, 2024, the Commission issued a Scheduling Order setting due dates for comments and reply comments. The Commission required that comments on the 2024-2025 IRP must be submitted by Thursday, August 22, 2024, and

that Reply Comments must be submitted Thursday, September 26, 2024. Scheduling Order issued June 27, 2024, Docket No. 24-057-04.

On August 22, 2024, the Utah Division of Public Utilities (“Division”) and the Utah Office of Consumer Services (“Office”) both filed Comments addressing the 2024-2025 IRP. The Company respectfully submits these Reply Comments in reply to the Division’s Comments and the Office’s Comments.

DISCUSSION

The Company agrees with Division’s conclusions that the 2024-2025 IRP complies with the Commissions orders and the applicable IRP guidelines. Division’s Comments at p. 1. The Company also agrees with the Division’s and Office’s recommendations that the Commission acknowledge the 2024-2025 IRP. Additionally, the Office recommended that the Company address additional issues in its future IRPs. Enbridge Gas addresses each of those issues below.

I. Data Centers

The Office recommends that the Company incorporate more detail in the Data Center section of future IRPs regarding requests for Enbridge Gas to connect and provide natural gas service to data centers. It also recommends the inclusion of a discussion of the potential impact of data centers in a Technical Conference.

Enbridge Gas agrees with the Office’s recommendation and will expand the Data Center section of future IRPs to include details regarding requests received by the Company to serve data center demand. The Company will also provide more information in a technical conference addressing data centers requests for service.

II. Storage Options

The Office recommends that the Company provide more analyses related to storage options and how they might provide price stabilization and supply reliability. In particular the Office recommends that, in future IRPs, the Company include scenarios including cost/benefit analyses of new potential storage options and their ability to address extreme pricing events like the one that occurred in 2021 and 2023. The Office also suggests that, in future IRPs, the Company address whether interruptible storage could provide benefits.

With the exception of its Magna LNG facility, Enbridge Gas obtains storage service from FERC-regulated storage service providers. The Company can only obtain such storage service when those services are available for purchase. The Company continues to work with storage service providers to identify potential storage opportunities and agrees to provide available details on all known potential storage options, including cost/benefit analyses and information pertaining to the potential impact on extreme pricing events in future IRPs. The Company will also discuss the risks and benefits of interruptible storage contracts.

III. Increasing Demand for Energy and Trend Toward a “Carbon-Free Energy Economy”

The Office also recommends that Enbridge Gas discuss how it will address the opposing industry trends of increasing demand and the shift toward a “carbon-free” energy economy in future IRPs. Specifically, the Office recommends that the Company address the reasonableness of large capital investments with long useful lives.

The Company has included discussion on industry trends and sustainability efforts in recent IRPs. The Company will continue to present these trends and it will discuss how

it plans to continue to provide its customers with safe and reliable service at a reasonable cost in the future. In this discussion the Company will discuss the reasonableness of large capital investments.

CONCLUSION

Enbridge Gas 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 26th day of September, 2024.

ENBRIDGE GAS UTAH



Jenniffer Nelson Clark

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Enbridge Gas Utah's Reply

Comments was served upon the following persons by e-mail on September 26, 2024:

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