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# UTAH DEPARTMENT OF COMMERCE

## Division of Public Utilities

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## Action Request Response

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Chris Parker, Director  
Brenda Salter, Assistant Director  
Doug Wheelwright, Utility Technical Consultant Supervisor  
Eric Orton, Utility Technical Consultant

**Date:** December 11, 2024

**Re:** **Docket No. 24-057-23**, Enbridge Gas Utah's Replacement Infrastructure 2025 Annual Plan and Budget.

## Recommendation (Acknowledge)

The Division of Public Utilities (Division) has reviewed Enbridge Gas Utah's (Enbridge or Company) Infrastructure Tracker Program (ITP) filing and has determined that it contains the required information as ordered. The Division recommends the Public Service Commission of Utah (Commission) acknowledge this filing as compliant.

## Issue

Enbridge is required to file an infrastructure replacement budget by November 15 of each year. The budget covers the replacement of feeder lines (FL), belt lines (BL) (also known as High Pressure (HP) or Intermediate High Pressure (IHP) lines) respectively, and undisclosed future projects for the upcoming year. In this filing, Enbridge provided its annual plan and budget describing the estimated costs and schedule for the Replacement Infrastructure program for 2025. The filing complies with the Commission's Order in Docket No. 22-057-03.

Division of Public Utilities

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## **Background**

On December 23, 2022, the Commission issued its Report and Order in Dominion's General Rate Case, Docket No. 22-057-03, which approved the continuation of the ITP. It also provided for the continuation of the GDP deflator to be used as an index to adjust the ITP budget cap on an ongoing basis.

On November 15, 2024, Enbridge filed its Replacement Infrastructure 2025 Annual Plan and Budget. Section 2.07 of Enbridge's tariff requires the Company to "file its next year's annual plan and budget describing the estimated costs and schedule for the Replacement Infrastructure with the Commission no later than November 15 of each year." Enbridge submitted the required forward-looking budget along with exhibits outlining the planned infrastructure replacement projects for the upcoming 2025 calendar year.

On November 15, 2024, the Commission issued an Action Request requesting the Division "Review for Compliance and Make Recommendations" with a due date of December 16, 2024. On November 18, 2024, the Commission issued a Notice of Filing and Comment Period stating that interested persons may submit comments on or before December 18, 2024. This is the Division's response to the Action Request as well as its comments.

## **Discussion**

In 2025, Enbridge expects to replace 115,198 linear feet (LF) of feeder line and 14,143 LF of belt line pipe. The proposed schedule represents approximately a 13% increase in the LF of feeder line to be replaced with the belt line receiving an increase of approximately 23%. The proposed budget of \$88.635 million is calculated by taking the 2020 allowed budget amount of \$72.2 million and adjusting for inflation as shown in Company Exhibit 5 of the application.

As indicated in the Company's Exhibit 1, \$71.3 million is allocated to replacing segments of nine FL's identified as: 23-2 (now known as 150), 21-19 (now known as 148), 13, 26, 34, 21-13 (now know and 145). An additional \$11 million is allocated to replace BL's in Salt Lake County. The remaining balance, approximately \$1.5 million, is allocated to pre-engineering studies or future work. This amount is approximately \$1 million more than in previous years but the same as last year.

Company Exhibit 2, page 1 identifies the LF within sections of pipe Enbridge plans to replace in the feeder line system, correlated with the size and date of installation. Following Division questions, the Company reported that there are a few changes to make note of: 1) the total footage that had been listed for FL13, should have been 48,277 but was originally listed as 42,663 by mistake. (The post 71 vintage had been left out of the total), 2) on FL21, there were 778 feet from post-1971 that were inadvertently excluded from the target replacement totals. The Correct amounts are specified in the table below.

Feeder Line			
FL Number	Diameter in inches	LF being replaced	Date of original installation
21	6	5,497	1956
	6	4,700	1957
	6	2,786	1964
	6	752	after 1972
	Sum	13,735	
	8	778	after 1972
	20	7,600	1957
	Total	22,113	
26	20	16,950	1962
	20	1,045	after 1972
	Total	17,995	
34	20	23,334	1962
		51	after 1972
	Total	23,385	
23	4	3,428	1962
13	12	42,668	1952
		5,609	after 1972
	Total	48,277	
Grand Total		115,198	

Company Exhibit 2, page 2 identifies the sections of pipe the Company plans to replace in the IHP or BL system, correlated with the size. Below is a summary of that information.

Belt Line	
Salt Lake County	
Diameter in inches	LF being replaced
24	65
20	0
16	9,212
12	3,066
10	10
8	1,790
Total	14,143

No IHP replacement work is scheduled for counties other than Salt Lake in 2025.

Company Exhibit 3 offers photographs of the geographic sections where the pipe is planned for replacement.

Company Exhibit 4 provides a Gantt chart projecting the timeline of the replacement work. According to the chart, the work on all replacements will be completed in calendar year 2025 except for the work on FL34 and the BL work in Salt Lake County, which is expected to continue throughout the year.

Company Exhibit 5 provides information for the GDP Deflator Rate Enbridge used to annually inflate the allowed budget to the new budget amount.

Company Exhibit 6 is a description and timeline of anticipated filings over the coming year.

The Division notes that the Company has committed to continue providing quarterly reports to the Division showing the progress and costs associated with this ITP. The Company plans to continue this ITP program at this currently projected rate, as adjusted for inflation.

## **Conclusion**

The Company's November 15, 2024, filing, outlining the Replacement Infrastructure Annual Plan and Budget for 2025, complies with the Commission's December 23, 2022, Report and Order in Docket No. 22-057-03. The Division recommends the Commission acknowledge the filing as compliant. The Division notes that this recommendation pertains to only the

annual budget filing requirement identified and should not be construed in any way as an endorsement or preapproval that these costs are prudently incurred or should be recovered in the Infrastructure Tracker Program.

This filing does not request any change in the Company's current rates, nor will it have any material impact on the Infrastructure Tracker Program.

cc: Kelly B. Mendenhall, Enbridge Gas Utah  
Michele Beck, Office of Consumer Services