

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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IN THE MATTER OF THE APPLICATION  
OF ENBRIDGE GAS FOR APPROVAL OF  
THE PICEANCE DEVELOPMENT AS A  
WEXPRO II PROPERTY

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Docket No. 25-057-03

**REBUTTAL TESTIMONY OF  
KELLY B MENDENHALL  
FOR  
ENBRIDGE GAS UTAH**

March 4, 2025

**EGU Exhibit 2.0R**

I. INTRODUCTION

1

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

3 A. My name is Kelly B Mendenhall. My business address is 333 South State Street, Salt Lake  
4 City, Utah.

5 **Q. Did you file direct testimony in this docket?**

6 A. Yes. I submitted direct testimony on behalf of Questar Gas Company dba Enbridge Gas  
7 Utah (“EGU”, “Enbridge Gas” or “Company”).

8 **Q. What is the purpose of your rebuttal testimony in this Docket?**

9 A. The purpose of my rebuttal testimony is to address certain recommendations raised in the  
10 direct testimony filed by Mr. Eric Orton in this matter. Specifically, I will address his  
11 proposal that the Company provide additional information in future Wexpro II  
12 applications. He details this proposal on lines 208-244 of his direct testimony.

13 **Q. Has the Company provided the information Mr. Orton’s identifies in his proposal in  
14 this docket?**

15 A. Yes, the Company provided that information during the February 13, 2025 technical  
16 conference in this docket. Mr. Orton has testified that he would like some of that  
17 information, specifically twelve (12) items, to be included in each future Wexpro II  
18 application.

19 **Q. Is the Company opposed to providing the requested information?**

20 A. No. The Company has provided this information during a technical conference and is not  
21 averse to providing similar information in technical conferences or in response to data  
22 requests from parties. However, to be clear, the Company opposes adding any “filing

23 requirements” to any future Wexpro II applications. Modifying the Wexpro II Agreement  
24 in this fashion would be unnecessary and problematic.

25 **Q. Can you explain why it is unnecessary for the data requests to be included as part of**  
26 **the actual Wexpro II application?**

27 A. Yes. As I mentioned earlier the Company has provided the requested information within  
28 a reasonable period so an additional directive from the Utah Public Service Commission  
29 (“Commission”) is not necessary. Also, Wexpro II applications are not filed on a specific  
30 cadence, sometimes going years between applications. The Division may prefer to receive  
31 some of this information more often. Leaving this information as part of the data request  
32 process allows the Division to request it whenever it deems it to be beneficial. The Division  
33 could request the information in any Wexpro II application proceedings, or even in a 191  
34 account audit. The Division can then determine if the information should be shared with  
35 the Commission in a technical conference or testimony as part of its comprehensive review  
36 of Wexpro information.

37 **Q. Why would it be problematic for the Commission to require the information to be**  
38 **included as part of future Wexpro II filings?**

39 A. The Wexpro agreements have traditionally been settlement agreements with four  
40 signatories. Those signatories are the DPU, Office of Consumer Services (OCS),  
41 Wyoming Office of Consumer Advocate (OCA) and the Wyoming Public Service  
42 Commission. Following past practice, for these data requests to become a part of the  
43 formal Wexpro II filing, all parties would need to agree that these should be included, and  
44 that agreement would need to be approved by both the Utah and Wyoming commissions.  
45 This seems overly burdensome when the Division can simply ask and receive the  
46 information anytime it is needed.

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**II. CONCLUSION**

48 **Q. Please summarize your testimony.**

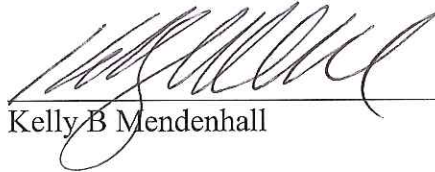
49 A. The Company is willing to provide to the Division with the information outlined by Mr.  
50 Orton through the data request process when requested. To require this information to be  
51 provided with every Wexpro II application would be unnecessary and problematic.

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

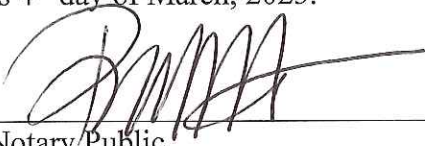
53 A. Yes.

State of Utah )  
 ) ss.  
County of Salt Lake )

I, Kelly B Mendenhall, 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. Except as stated in the testimony, the exhibits attached to the testimony were prepared by me or under my direction and supervision, and they are true and correct to the best of my knowledge, information and belief. Any exhibits not prepared by me or under my direction and supervision are true and correct copies of the documents they purport to be.

  
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Kelly B Mendenhall

SUBSCRIBED AND SWORN TO this 4<sup>th</sup> day of March, 2025.

  
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Notary Public

