

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION
OF ENBRIDGE GAS UTAH TO INCREASE
DISTRIBUTION RATES AND CHARGES
AND MAKE TARIFF MODIFICATIONS

Docket No. 25-057-06

**PHASE II REBUTTAL TESTIMONY OF
JORDAN PARKS FOR
ENBRIDGE GAS UTAH**

October 16, 2025

EGU Exhibit 7.0R

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I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Jordan Parks. My business address is 333 South State Street, Salt Lake City, Utah 84111.

Q. Did you file direct testimony in this docket?

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

Q. Were the attached EGU Exhibits 7.05R and 7.07R prepared by you or under your direction?

A. Yes. EGU Exhibit 7.05R is in legislative format, EGU Exhibit 7.06R is in final proposed format and EGU Exhibit 7.07R is in legislative format that shows the proposed language from direct testimony (in red) and the proposed changes mentioned in this testimony (in blue).

Q. What is the purpose of your testimony?

A. The purpose of my rebuttal testimony is to address certain issues raised in the Phase II direct testimonies filed by Mr. Ryan Daigle, witness for the Division of Public Utilities (“DPU”, “the Division”), Mr. James Daniel, witness for the Office of Consumer Services (“OCS”, “the Office”) and Mr. Eric Orton witness for the DPU, Specifically, I respond to their proposed revisions to various sections of the Company’s Natural Gas Tariff No. 700 (“Tariff”).

21 **II. TARIFF CHANGES**

22 **A. TARIFF SECTIONS 5.04-5.06**

23 **Q. Does the Division support the Company’s proposed amendments to Sections 5.04-5.06**
24 **as discussed in your direct testimony?**

25 A. Yes. Mr. Daigle testifies that the Division agrees with EGU’s proposal “as it proportionally
26 allocates usage to their proper designations (i.e. falling below the minimum usage
27 requirement) which previously was only in place for the lower usage boundaries.”¹

28 **B. TARIFF SECTION 8.03**

29 **Q. What changes does Mr. Daniel propose to Section 8.03 of the Company’s tariff?**

30 A. Mr. Daniel recommends revising the “Energy Assistance Eligibility” section of the tariff.²
31 He argues that the section heading is unclear and that the tariff should include more detailed
32 information about how the HEAT program operates, including the duration of eligibility
33 and timing of bill credits.³

34 **Q. What is the Company’s role in administering the HEAT Program?**

35 A. The HEAT program is not operated by the Company, it is administered by the Utah
36 Department of Workforce Services Housing and Community Development Agency.
37 Customers who qualify receive a one-time credit on their monthly bill once the Company
38 has been notified by the Department of Workforce Services of their qualification.

39 **Q. What is your response to Mr. Daniel’s recommendations?**

40 A. Mr. Daniel’s testimony highlights important issues regarding the clarity of the tariff
41 language related to energy assistance eligibility and the HEAT assistance program. The
42 Company is currently working with the OCS on new tariff language to address the concerns
43 raised by Mr. Daniel.

1 DPU Exhibit 7.0 Daigle DIR Phase II at 12:233-35.

2 OCS Exhibit 3.0 Daniel DIR Phase II at 7-9.

3 *Id.*

44 **Q. Does the Division support the Company’s proposed amendments to Section 8.03 as**
45 **discussed in your direct testimony?**

46 A. Yes. DPU witness Mr. Orton agrees that the duplicative language should be removed as
47 set forth in my direct testimony.⁴

48 **C. TARIFF SECTION 8.09**

49 **Q. Does the Division support the Company’s proposed amendments to Section 8.09 as**
50 **discussed in your direct testimony?**

51 A. Yes. Mr. Orton concurs with EGU’s proposal to “remove the interest expense placed on
52 the under-collected balance in the RNG GreenTherm Program.”⁵

53 **D. TARIFF SECTION 9.02**

54 **Q. Do you agree with Mr. Orton’s recommended language change to Section 9.02 of the**
55 **Tariff?**

56 A. Yes. The language proposed by Mr. Orton more clearly defines when a customer may be
57 required to make an upfront payment for preliminary engineering costs. Changing the
58 language from "particularly complex" to "requires contracted engineering support" more
59 accurately represents the types of projects for which the Company may require an upfront
60 payment for preliminary engineering work.⁶ This change is reflected in EGU Exhibits
61 7.05R, 7.06R and 7.07R.

62 **Q. Did any other intervening parties propose changes to Tariff Section 9.02?**

63 A. Yes. Mr. Daniel recommends two changes to the preliminary engineering costs for large
64 scale projects section in Tariff Section 9.02. First, rather than including the language that,
65 “the Company **may** require the customer to make an up-front payment for engineering
66 costs” Mr. Daniel proposes the language should be “the Company **shall** require the
67 customer to make an up-front payment for engineering costs”, effectively making the up-

4 DPU Exhibit 1.0 Orton DIR Phase II at 6.

5 *Id.*

6 DPU Exhibit 1.0 Orton DIR Phase II at 7-8.

68 front payment mandatory. Second, Mr. Daniel recommends that the \$50,000,000 system
69 improvement threshold for requiring a customer to make an upfront payment be lowered
70 to \$10,000,000.

71 **Q. Does the Company agree with Mr. Daniel’s recommendation to change the word**
72 **“may” to “shall” in Section 9.02 of the tariff?**

73 A. Yes. The Company agrees with the change proposed by Mr. Daniel. This change is
74 reflected in EGU Exhibits 7.05R, 7.06R and 7.07R.

75 **Q. Does the Company agree with Mr. Daniel’s recommendation to lower the threshold**
76 **for requiring the upfront engineering cost payment from \$50 million to \$10 million?**

77 A. No. The \$50 million threshold was selected to target only the largest and most complex
78 projects. Lowering the threshold to \$10 million would significantly expand the number of
79 projects subject to this requirement, including many that are routine, including those whose
80 up-front engineering effort is minimal and not overly burdensome. This could increase
81 administrative overhead for the Company and would lengthen the overall project siting
82 process for potential customers.

83 **E. TARIFF SECTION 10.02**

84 **Q. Does the Division support the Company’s proposed amendments to Section 10.02 as**
85 **discussed in your direct testimony?**

86 A. Yes. Mr. Orton agrees with the proposed references that EGU seeks to insert into the tariff
87 regarding calculation of the Municipal Energy Sales and Use Tax because “customers
88 should have a trail to follow for not only the amounts but the basis for the taxes they are
89 being assessed on their natural gas bill.”⁷

7 DPU Exhibit 1.0 at 8:185-186.

90 **III. CONCLUSION**

91 **Q. Please summarize your testimony.**

92 A. Each of the Company's proposed substantive Tariff changes as explained in my direct
93 testimony, and in some cases as modified here in my rebuttal testimony in response to
94 feedback from the Division, are just, reasonable, and in the public interest. Indeed, the vast
95 majority of the Company's proposed Tariff changes are uncontested (*i.e.*, no party opposed
96 the suggested changes to Sections 5.01, 5.04-5.06, 8.09, 10.02, and the Company's
97 clarifying/clean-up edits). And the Division affirmatively supports the changes to Sections
98 5.04-5.06, 8.03, 8.09, 9.02 as modified, and 10.02. The only objection to specific Tariff
99 language comes from Office witness Mr. Daniel regarding Sections 8.03 and 9.02 The
100 Company recommends that the Commission approve the proposed Tariff language as
101 presented and described in this rebuttal testimony and reject the further changes that the
102 Office requests.

103 **Q. Does that conclude your testimony?**

104 A. Yes.

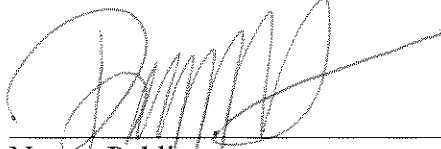
State of Utah)
) ss.
County of Salt Lake)

I, Jordan Parks, 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.



Jordan Parks

SUBSCRIBED AND SWORN TO this 16th day of October, 2025.



Notary Public

