

1 **Q. Please state your name and position.**

2 A. My name is David Fields. I am employed as a Utility Analyst by the Division of Public
3 Utilities (“DPU” or “Division”) for the State of Utah.

4 **Q. Are you the same David M. Fields who filed Phase II direct testimony in this
5 proceeding?**

6 A. Yes, I am.

7 **Q. What is the purpose of your surrebuttal testimony?**

8 A. The purpose of my surrebuttal testimony is to address the rebuttal testimony of
9 Enbridge Gas Utah's ("Company" or "Enbridge") witnesses David C. Landward and
10 Austin Summers. This testimony addresses justifications to reset the time span for
11 the derivation of normal heating degree days ("NHDD") from the 20-year period
12 ending December 31, 2018, to the 10-year period ending December 31, 2024, as
13 well as the Company's computational resources with respect to customer-specific
14 weather normalization adjustment.

15 **Q. What justification did Mr. Landward provide for using a 10-year period instead
16 of a 20-year period to derive NHDD?**

17 A. Mr. Landward indicated that lately most of the monthly weather normalization
18 adjustments for the general service (GS) class have been positive.¹ To alleviate this
19 problem, he suggests reducing the time span used for the derivation of NHDD from
20 20 years to 10 years.² This would help balance the upward and downward
21 adjustments.³

22 **Q. What evidence did Mr. Landward provide to support this claim?**

¹ Phase II Rebuttal Test. of David C. Landward (Oct. 16, 2025) at 4:74-76.

² *Id.* at 4-6:84-123.

³ *Id.* at 4:80-83.

23 A. Mr. Landward provided a graph of the annual HDDs at Salt Lake International Airport
24 Station from 1950 – 2024.⁴ The graph shows that the NHDD for the period ending
25 2024 went down as that period is shortened from 20 to 15, to 10 years.⁵

Time Span	NHDD
20-years ending 2018	5353
20-years ended 2024	5196
15-years ended 2024	5036
10-years ended 2024	4878

26 Hence, reducing the base time span to 10 years would give more weight to recent
27 warm winters, thereby lowering the normal baseline in winter months.⁶

28 **Q. Do you agree to this assertion?**

29 A. Although the above average values do vary in magnitude, Mr. Landward did not
30 empirically verify that these values are statistically significantly different from one
31 another. Therefore, the Division cannot confidently use the NHDD value based on
32 the 10-years ended 2024 to infer anything about the behavior of GS customers going
33 forward. Whether the proposed change in the time span would balance the upward
34 and downward adjustments is not clear.

35 **Q. What do you propose?**

36 The Division has not been persuaded by Mr. Landward's proposal to use a time
37 span of 10 years. The choice of 10 years over other options seems to be one of
38 convenience, so a more detailed empirical analysis to adequately justify the need for
39 a 10-year time span is requisite. Therefore, the Division recommends the
40 Commission direct the Company and other interested parties to further study the
41 issue.

⁴ EGU Exhibit 6.04R – Annual HDD 10-16-2025.

⁵ *Id.*

⁶ Phase II Rebuttal Test. of David C. Landward (Oct. 16, 2025) at 4:85-99.

42 **Q. You assert that the National Oceanic and Atmospheric Administration**
43 **(“NOAA”) requires a 30-year baseline to derive NHDD. Is that assertion true?**

44 A. Yes. NOAA, through its National Centers for Environmental Information (NCEI),
45 uses a standardized 30-year baseline for the calculation of NHDD. Its
46 comprehensive 30-year averages, which undergo a decennial update, are crucial for
47 establishing a “normal climate,” which functions as a robust and long-term standard
48 baseline. Its primary purpose is to facilitate comparative analysis, allowing for the
49 most accurate assessment of deviations from typical conditions and providing
50 essential context for understanding climate trends and energy consumption patterns
51 over significant periods of time.⁷

52 **Q. What evidence does Mr. Landward present in support of the claim that**
53 **switching to a 10-year normal would yield more accurate, weather-normalized**
54 **usage forecasts, and what are the potential weaknesses or fallacies in his**
55 **assertion regarding enhanced accuracy?**

56 A. In his rebuttal testimony, Mr. Landward posits that a proposed 10-year normal would
57 yield forecasts of weather-normalized usage that more accurately reflect
58 contemporaneous consumption patterns.⁸ While Mr. Landward presents empirical
59 evidence from readings at the Salt Lake International Airport that at no point in the
60 past 11 years (2014–2024) has the annual total of Heating Degree Days (HDD)
61 reached the average annual HDD from the preceding 11 years (2003–2013),⁹ this
62 assertion regarding enhanced accuracy is not necessarily robust. Mr. Landward did
63 not show that the HDD for the last 11 years were statistically significantly different
64 than the years that preceded them. This reference to a downward trend in measured
65 temperatures could be an isolated case or some underlying cyclical pattern, and thus
66 its utilization to form a general conclusion would constitute a fallacy of composition.

⁷ U.S. Climate Normals, <https://www.ncei.noaa.gov/products/land-based-station/us-climate-normals>.

⁸ Phase II Rebuttal Test. of David C. Landward at 5:101-12.

⁹ *Id.* at 4:65-83; EGU Exhibit 6.04R – Annual HDD 10-16-2025.

67 **Q. In your direct testimony, you sought clarity on whether the Company**
68 **calculates a weather adjustment each billing period for every GS customer.**
69 **Did the Company address this issue?**

70 A. Mr. Landward suggests that the Company has effectively implemented weather
71 normalization for individual customer bills since 2004.¹⁰ This process, according to
72 Mr. Landward, is facilitated by the Company's existing billing software, Customer
73 Care and Billing (CCB).¹¹ He further asserts that all functionalities within the billing
74 system, including the critical weather normalization component, have undergone
75 rigorous and comprehensive testing to ensure its precision and operational
76 viability.¹² Moreover, Mr. Landward contends that a distinct normalization adjustment
77 is meticulously calculated and applied to each individual customer's bill every time a
78 new bill is generated.¹³

79 Mr. Landward's assertion that the information in EGU Exhibit 6.02 was produced
80 from the full set of individual customer billing determinants, pulled directly from the
81 billing system and processed on a simple desktop computer without complications or
82 inefficiencies, is provisional, as details on the methodologies employed to verify
83 accuracy and practicality are absent. This raises concerns regarding the
84 demonstrable implementation, the specific testing protocols utilized, and the granular
85 specifics of how individual normalization adjustments are calculated and applied
86 within the CCB system.

87 **Q. What position does Mr. Summers take regarding your proposed further study**
88 **on the issue of the time span for the derivation of NHDD?**

¹⁰ Phase II Rebuttal Test. of David C. Landward at 6-7:137-52.

¹¹ *Id.*

¹² *Id.* at 6:137-40.

¹³ *Id.* at 6:128-32.

89 A. In his rebuttal testimony, Mr. Summers indicated that the issue of weather
90 normalization has been explored in detail and that he does not see any benefit that
91 could be gained from any further study.¹⁴

92 **Q. What is your response to Mr. Summers's assertion?**

93 A. I respectfully disagree with this assertion. While the information provided by Mr.
94 Landward raises the question of whether a time change is needed concerning
95 NHDD, it is not sufficient in determining what the appropriate time span should be,
96 thus necessitating further study.

97 **Q. Please summarize your testimony.**

98 A. Enbridge's proposal to modify the methodology for deriving NHDD by reducing the
99 time span to 10 years necessitates more extensive empirical substantiation. This is
100 particularly crucial given that the NOAA National Centers for Environmental
101 Information (NCEI) employs a standardized 30-year baseline for the meticulous
102 calculation of NHDD. The reference to a downward trend in measured temperatures
103 from the Salt Lake International Airport may be an isolated case, which, by
104 implication, requires more comprehensive comparative analysis if a general
105 conclusion is to be drawn. Therefore, the Division recommends that the Commission
106 require the Company to provide more precise and robust evidence before revising
107 the baseline for NHDD calculation. Without such substantiation, the proposed
108 change introduces a level of uncertainty and potential inaccuracy in forecasting
109 heating demand, especially given the dearth of details of the Company's
110 methodology for calculating GS customer-specific weather adjustments.

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

112 A. Yes.

¹⁴ Phase II Rebuttal Test. of Austin Summers at 27:641-43.