

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 SURREBUTTAL TESTIMONY OF
JORDAN PARKS FOR
ENBRIDGE GAS UTAH**

November 4, 2025

EGU Exhibit 7.0SR

1

I. INTRODUCTION

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

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

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

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

8 **Q. Were the attached EGU Exhibits 7.08SR through 7.10SR prepared by you or under**
9 **your direction?**

10 A. Yes. Each of these exhibits reflects the Company’s proposed sheets for the Company’s
11 Utah Natural Gas Tariff No. 700 (“Tariff”). EGU Exhibit 7.08SR is in legislative format,
12 EGU Exhibit 7.09SR is in final proposed format, and EGU Exhibit 7.10SR is in legislative
13 format that shows the proposed language from direct testimony (in red) and the proposed
14 changes mentioned in my rebuttal testimony as well as this testimony (in blue).

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

16 A. The purpose of my surrebuttal testimony is to address certain issues raised in the Phase II
17 direct testimony and reiterated in the Phase II rebuttal testimony filed by Mr. James Daniel,
18 witness for the Office of Consumer Services (“OCS”, “the Office”).¹ Specifically, I
19 respond to his proposed revisions to Section 8.03 of the Company’s Tariff.

¹ OCS Exhibit 3D Daniel Direct Phase II at 7-9; OCS Exhibit 3R Daniel Rebuttal Phase II at 20.

20 **II. TARIFF CHANGES**

21 **A. TARIFF SECTION 8.03**

22 **Q. In your rebuttal testimony, you indicated that the Company was working with the**
23 **OCS to address concerns about Section 8.03 of the Tariff. What has occurred since**
24 **then?**

25 A. In my rebuttal testimony, I explained that the Company was collaborating with the OCS to
26 improve clarity in the Energy Assistance section of the Tariff. Since that time, the
27 Company and the OCS have worked together to propose revisions to Section 8.03 to make
28 the eligibility requirements and program details more transparent and easier for customers
29 to understand. The Company appreciates the OCS's thorough review of the Tariff
30 language and their collaboration in drafting these improvements.

31 **Q. What changes have been made to the Energy Assistance section since your rebuttal**
32 **testimony?**

33 A. The updated Energy Assistance section clarifies that customers may qualify for the credit
34 each heating season (October 1 through September 30) by applying through the Utah
35 Department of Workforce Services Housing ("DWS") and Community Development
36 Agency or an equivalent agency. Qualification is based on approval for HEAT assistance
37 or a similar program. Once qualified, customers will receive the EGU Energy Assistance
38 credit.

39 The section also explains that HEAT is federally funded, with benefit levels determined by
40 DWS and passed through to EGU customers. Customers who qualify will receive a one-
41 time credit on their account if any portion of their HEAT benefit is designated to the
42 Company, with only one credit provided per heating season. Qualification is valid for the
43 current heating season, and customers must requalify annually to continue receiving
44 assistance. Additionally, those who receive the credit will not be assessed the Energy
45 Assistance charge for 12 months following qualification.

46 **Q. Were there any other structural or formatting changes in the Tariff?**

47 A. Yes. A new section titled “Energy Assistance Rate and Credit” was created. The paragraph
48 beginning with “No less than once per year...” from the previous section was moved under
49 this new heading, and an additional sentence was added stating that the Energy Assistance
50 rate and the amount of the energy assistance credit are listed on the individual rate
51 schedules in the Tariff. These changes improve organization and make it easier for
52 customers to locate rate and credit information.

53 **Q. Were there any changes made to other sections in the Tariff?**

54 A. Yes. The Energy Assistance provision in each individual rate schedule was updated to
55 reference the description provided in Section 8.03 of the Tariff. This change ensures
56 uniform language across all rate schedules and directs customers to the primary section
57 where full eligibility criteria and credit details are explained.

58 **Q. In what sections can these changes be found?**

59 A. Updates were made to the Energy Assistance provision in Tariff Sections 2.02, 2.03, 2.04,
60 4.02, 5.02, 5.03, 5.04, 5.05, and 5.06. These changes are reflected in EGU Exhibits 7.08SR,
61 7.09SR, and 7.10SR.

62 **Q. What will the Company do to update the Tariff after the Public Service Commission
63 of Utah (“Commission”) issues an order with final rates?**

64 A. Once the Commission approves final rates, the Company will file a compliance Tariff that
65 incorporates all approved rate case changes as well as any approved Tariff modifications
66 that have been approved since the rate case was filed.

67 **III. CONCLUSION**

68 **Q. Please summarize your testimony.**

69 A. Each of the Company’s proposed revisions to Section 8.03 of the Tariff, as explained in
70 my direct and rebuttal testimony and further refined here in surrebuttal, are just, reasonable,

71 and in the public interest. The changes clarify eligibility for Energy Assistance, improve
72 organization by creating a new “Energy Assistance Rate and Credit” section, and ensure
73 consistency by updating references in all rate schedules. These updates were developed
74 collaboratively with the Office of Consumer Services to enhance transparency and
75 customer understanding. The Company recommends that the Commission approve the
76 revised Tariff language as presented in this surrebuttal testimony.

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

78 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 4th day of November, 2025.



Notary Public

