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Memorandum

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

Matthew Pernichele, Utility Technical Consultant

Date: January 15, 2026

Re: **Docket No. 25-057-06**, Application of Enbridge Gas Utah to Increase Distribution Rates and Changes and Make Tariff Modifications

Recommendation (No Action)

The Utah Public Service Commission's (Commission) December 24, 2025, Order¹ (Order) in this case ruled that Enbridge Gas Utah's (Company) Heating Degree Day (HDD) calculation should be based on the average temperatures over a 15-year period,² as proposed by the Office of Consumer Services³ (OCS). The rates set forth in the Order appear to be based on the 10-year HDD study presented by the Company⁴ and do not reflect a 15-year HDD study. No actual 15-year HDD study was presented by any party in this docket. Thus, nothing in the record could be used to implement the Commission's chosen standard in rates.

The Company estimates that this discrepancy would result in approximately \$750,000 per year in overcharges to the GS Class. The Commission has approved new tariffs incorporating these rates and they have been programed into the Company's billing system. Altering these rates to account for the correct 15-year HDD calculation would require billing

¹ Order (December 24, 2025).

² *Id.* p. 29.

³ Phase II Direct Testimony of James W. Daniel for the Office of Consumer Services, p. 10 (September 16, 2025).

⁴ Direct Testimony of David C. Landward for Enbridge Gas Utah, p. 2 (May 1, 2025).



adjustments and tariff changes that could confuse customers and be onerous for the Company. Particularly over a short period of time, adjusting these rates would provide a minimal benefit to each individual affected ratepayer. If these rates are left in place, the Conservation Enabling Tariff (CET), which will be based on a 15-year HDD calculation to comply with the Order, will reconcile this overcollection automatically.

The OCS, Utah Division of Public Utilities, Utah Association of Energy Users, and the Company agree that returning this small amount to customers through the CET is preferable to issuing small refunds or bill credits to every member of the GS Class.

cc: Austin Summers, Enbridge Gas Utah
Michele Beck, Office of Consumer Services