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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

APPLICATION OF ENBRIDGE GAS UTAH TO AMORTIZE THE CONSERVATION ENABLING TARIFF BALANCING ACCOUNT	Docket No. 25-057-15 ENBRIDGE GAS UTAH'S REPLY COMMENTS

Pursuant to the Scheduling Order and Notice of Virtual Hearing issued on September 8, 2025, in the above-referenced docket, Questar Gas Company dba Enbridge Gas Utah ("Enbridge Gas" or "Company") respectfully submits these Reply Comments in response to the Utah Division of Public Utilities ("Division") comments filed in this docket on September 19, 2025.

On August 29, 2025, the Company filed an Application with the Public Service Commission of Utah ("Commission") requesting approval to adjust the CET amortization rate to amortize the Conservation Enabling Tariff balancing account.

The Company has reviewed the Division's comments and offers these Reply Comments. The Company appreciates the Division's review of this matter and recommendation that the proposed CET amortization rates be approved. The Company would like to respond to two statements by the Division. First, on page 9 of the Division's memo, the Division states that "the balance continues to be a significant over-collection, which should be returned to customers as quickly as possible." In the Company's view, the objective of its proposed amortization rates is not to amortize the existing balance "as quickly as possible". Rather, the amortization rates are designed to amortize the current CET balance over a 12-month period, consistent with section 2.08 of its Tariff No. 700. This is a measured and balanced approach that amortizes these amounts over a reasonable amount of time. This has been the practice for the CET since its inception. This approach has worked as intended. The following table provides the CET balances as filed at certain points in time, as well as the resulting amortizations following that filing:

Docket Number	**CET Balance Used for Amortization Rates**	**Planned Amortization Period**	**Amortization During Planned Period**
20-057-16	$4.1M – Aug 2020	Nov 20 – Oct 21	-$4.0M
21-057-20	$2.8M – Aug 2021	Nov 21 – Oct 22	-$2.9M
22-057-15	$4.1M – Aug 2022	Nov 22 - Oct 23	-$4.4M
23-057-16	-$23.3M – Oct 2023	Jan 24 – Dec 24	$20.1M
24-057-19	-$22.6M - Aug 2024	Nov 24 - Oct 25	$21.0M*

*Includes amortizations through July 2025

As this table demonstrates, the amortization rates have been very effective at amortizing the intended CET balances over the planned amortization period. This established approach helps reduce unnecessary volatility and swings in customer bills. If the objective were to simply return the balance as quickly as possible, leaving the amortization rate unchanged would accomplish this objective more effectively, but would also lead to a large overcorrection in the CET account balance. This is shown in Chart 5 of the Division's comments. In this case, both the Company and Division agree that the amortization rate should be reduced to appropriately amortize the current balance over a 12-month period.

The second comment the Company wishes to address is the Division's statement on page 13 indicating that if the CET account fails "to reach the milestones provided by the account balance forecasts (in Charts 1 & 5), the Division will request a filing to expedite the payback of the over-collected amount to customers." It is unclear which particular milestone the Division is referring to in Chart 5 regarding the CET balance. As mentioned, the amortization is designed to occur over a 12-month period, which would end in September 2025. Filing more frequently may not accelerate the amortization of the CET account balance but rather decelerate that amortization. This is because, as shown in Chart 5, the balance is expected to decrease over time. If the balance decreases by some amount less than the amounts shown in chart 5, adjusting the amortization rate to reflect that new decreased balance would result in a lower CET amortization credit – which in turn would decelerate the amortization to customers compared to leaving the rate alone for the full anticipated period.

Ultimately, the goal of the CET is to ensure the Company only books the allowed revenue-per-customer and returns any over or under collected amounts to customers through the CET amortization. The CET has accomplished this objective. EGU Exhibit 1.1, Line 1 shows the Company had an over collected balance in August 2024 of $22.6 million (Column F). During the 11 following months through July 2025, the Company returned $22.2 million of that balance to customers through the CET amortization (Column C). Following August 2024, the Company over-collected an additional $7.2 million through July 2025 (Column B) and also booked $0.8 million in interest owed to customers (Column D), resulting in the majority of the current $8.4 million balance to be amortized. The $8.4 million balance will again be amortized over a 12-month period. The Company views this cadence as appropriately measured and balanced and avoids unintended consequences of either overcorrecting or slowing the intended amortization.

Enbridge Gas Utah appreciates the Division's diligent and thorough review of the amortization of the Conservation Enabling Tariff balance and acknowledges the Division's efforts to ensure that the rates and associated calculations are just, reasonable, and in the public interest.

Accordingly, the Company respectfully submits these reply comments and respectfully requests that the CET amortization rates to be approved.

RESPECTFULLY SUBMITTED this 23rd day of September 2025.

ENBRIDGE GAS UTAH

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the Enbridge Gas Utah's Reply Comments was served upon the following persons by e-mail on September 23, 2025:

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