

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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IN THE MATTER OF THE APPLICATION  
OF ENBRIDGE GAS UTAH TO EXTEND  
GAS SERVICE TO FAIRFIELD, UTAH

Docket No. 25-057-20

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

January 20, 2026

**EGU Exhibit 5.0**

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INTRODUCTION

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

A. Jordan Parks, 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. What is the purpose of your testimony?**

A. The purpose of my rebuttal testimony is to address certain issues raised in the direct testimony filed by Ms. Kelley O’Connor, witness for the Division of Public Utilities (“DPU”, “the Division”).

**Q. What general areas does your testimony address?**

A. My testimony responds to concerns raised by the DPU in direct testimony regarding community growth, customer interest, cost-per-customer and comparisons to other rural expansion projects. I also address factors such as statutory compliance, location, income and network integration.

**I. RESPONSE TO DIVISION CONCERNS**

**A. Community Growth and Economic Development**

**Q. The Division asserts that community growth benefits are speculative without independent demographic projections. How do you respond?**

A. The presence of natural gas service is a critical enabler for economic development. Communities with access to natural gas are far better positioned to attract commercial, industrial, and residential growth than those without it. This has been the case for every community the Company has extended natural gas service to. In Fairfield specifically, the mayor indicated that existing businesses and residents have expressed interest in the commercial, industrial and residential growth opportunities natural gas would provide. This interest proves that the benefits are not merely speculative, they are immediate and tangible. Businesses recognize the cost advantages, efficiency, and

31 reliability of natural gas compared to propane or other fuel sources. These factors  
32 directly influence decisions to expand operations or invest in new facilities, while also  
33 attracting other commercial and development opportunities to the community.

34 **B. Project Sizing**

35 **Q. Why did the Company propose an 8-inch main for Fairfield when the existing**  
36 **demand could be served with a smaller size main?**

37 A. The 8-inch main was proposed in order to meet the demand of the existing community  
38 and provide plenty of excess capacity for both residential/commercial growth and  
39 industrial growth opportunities. It is an acceptable best engineering practice to oversize  
40 the design of a primary feed pipeline beyond the expected growth rate projection to  
41 accommodate for reasonable unknown large loads such as schools, hospitals, housing  
42 developments, industrial facilities, and agricultural demand. Oversizing ensures  
43 reliability and accommodates future growth without requiring costly upgrades later.

44 **Q. Could the Company reduce the size of the main proposed to serve Fairfield to**  
45 **lower costs?**

46 A. The Company could consider reducing the size of the main line to a six-inch main, as  
47 it would lower the total cost of the project, but it would also reduce the amount of  
48 excess capacity available. This could limit the long-term growth potential of the  
49 community.

50 **C. Number of Customers**

51 **Q. Should the number of potential customers be considered when evaluating rural**  
52 **expansion projects?**

53 A. Yes, however the number of potential customers alone should never be the sole  
54 determinant of whether a project is in the public interest. Larger communities like  
55 Genola naturally have more potential customers, but they also come with significantly  
56 higher associated costs for infrastructure. The Company evaluates each project  
57 holistically, including cost per customer, customer density, engineering requirements,  
58 distance to extend pipeline infrastructure, distance to the Company's current operation  
59 centers, and statutory spending caps. Fairfield's smaller size means lower total project  
60 costs, and when viewed on a cost-per-customer basis, compares favorably to projects  
61 already approved by the Commission and other communities the Company is

62 considering for future expansion projects.

63 **Q. How does the number of potential customers compare to the number of meters**  
64 **that will ultimately be installed, and what does that indicate about community**  
65 **interest?**

66 A. While not every potential customer will choose to connect, the level of interest in  
67 Fairfield is exceptionally high. Of the 87 potential serviceable structures, 62 residents  
68 have already indicated they want natural gas service. That represents approximately  
69 71% of all potential customers expressing affirmative interest before construction even  
70 begins. The Company has seen in other rural expansion communities, as residents see  
71 their neighbors get gas service, they often follow and sign up for service as well. This  
72 strong engagement aligns with participation trends in other rural expansion  
73 communities and emphasizes that Fairfield is well-positioned for a successful project.

74 **Q. Have more customers began receiving gas service than those who indicated they**  
75 **were interested in natural gas?**

76 A. Yes. The chart below summarizes the current number of customers who have a meter  
77 installed and are receiving gas service and the number of customers who responded  
78 “yes” to the interest survey. In the communities of Eureka, Goshen/Elberta, and Green  
79 River the number of customers who are actively taking service is more than the number  
80 of survey respondents who indicated they were interested in natural as service. In the  
81 more recent projects in Genola and Portage, the Company is still actively installing  
82 meters and anticipates the number of meters to surpass the number of survey  
83 respondents interested in gas service.

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	Potential customers	Meters Installed	Survey "Yes" respondents
Eureka 19-057-31	360	267	189
Goshen/Elberta 21-057-06	379	283	181
Green River 21-057-12	483	314	216
Genola 23-057-13	507	199	252
Portage 24-057-13	107	28	71
Fairfield 25-057-20	87		62
South Rim 25-057-21	356		135

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94 **Q. What does it mean when the number of meters installed exceeds the number of**  
95 **positive survey respondents?**

96 **A.** This indicates that as residents observe their neighbors receiving natural gas service,  
97 they are often encouraged to sign up themselves. It also suggests that the total number  
98 of customers ultimately taking service will likely surpass the initial number of survey  
99 respondents who expressed interest.

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**D. Comparison to Portage**

101 **Q. How does Fairfield compare to other smaller-scale projects previously approved,**  
102 **such as Portage?**

103 **A.** Portage had a similar number of potential customers, 107 compared to 87 in Fairfield,  
104 and both projects had similar cost per customer projections.

105 **Q. Did the Division raise concerns about the size of the Portage community?**

106 **A.** No, the Division did not raise any issues with the number of potential customers being  
107 too small.

108 **Q. Is location and customer density a relevant consideration when deciding if a rural**  
109 **expansion project should be approved?**

110 **A.** No, it is not. The statutory requirements do not state that these factors need to be  
111 considered when deciding on project approval. While the Division notes that Fairfield  
112 is 20 miles from Lehi, it is much closer to Eagle Mountain, a rapidly-growing  
113 community that the Company serves that is less than 8 miles from Fairfield.

114 **Q. Is location and customer density a relevant consideration when evaluating**  
115 **communities for future rural expansion projects?**

116 A. Yes. Communities that are not located near the Company's existing service territory  
117 could require additional Company personnel or an office location to ensure reliable  
118 service, increasing the overall cost of the project. Communities that are close to the  
119 Company's service territory can be served by existing Company personnel and will not  
120 require additional overhead costs.

121 The Company considers customer density when evaluating candidate communities  
122 to better understand the necessary infrastructure that will need to be in place. More  
123 concentrated communities require less main and potentially fewer service lines,  
124 impacting the overall cost of the project.

125 While the Division highlights differences in location and customer density between  
126 Fairfield and Portage, they do not explain why these factors should disqualify Fairfield  
127 from being considered for natural gas service.

128 **Q. Is there a difference in income between residents in Fairfield and Portage?**

129 A. The Division highlights the difference in median household income between Fairfield  
130 and Portage as \$122,500 and \$55,313 respectively. While there are differences in the  
131 median income, the mean income in each community is similar, with the average in  
132 Fairfield being \$105,137 and the average in Portage being \$92,175<sup>1</sup>. This indicates that  
133 the median income difference is largely due to distribution. Fairfield has a higher  
134 concentration of households at the upper end, which skews the median upward. Using  
135 median income alone overstates the disparity and does not accurately reflect the ability  
136 of residents in either community to afford natural gas conversion costs. Income  
137 differences should not be viewed as a barrier to rural expansion and communities  
138 should not be excluded from rural expansion consideration based on income levels.

139 **E. Network Integration**

140 **Q. Is it a requirement that a rural expansion project must provide a unique**  
141 **contribution to the existing network in order to be approved?**

142 A. No. Utah Code §54-17-402 does not require a project to demonstrate a unique network  
143 contribution as a condition for approval. The statute focuses on whether the project is  
144 in the public interest, considering factors such as the potential benefits to previously  
145 unserved areas, the number of new customers, and cost impacts. While network

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1 U.S. Census Data, 2023 American Community Survey 5-Year Estimates.

146 integration can be a positive factor, it is not a statutory prerequisite. Fairfield meets all  
147 required criteria for public interest regardless of whether its extension creates a major  
148 network enhancement.

149 **Q. Does the Fairfield project contribute to the existing network even though it is not**  
150 **a statutory requirement?**

151 A. Yes. The SR-73 corridor is a logical growth path for Utah County. By extending the  
152 system through Fairfield, EGU creates a backbone that can support future communities  
153 and commercial developments in the area.

154 **Q. Did the Company's rural expansion project to Green River, Utah in Docket No.**  
155 **21-057-12 allow for the communities of Moab and Monticello to be better served?**

156 A. No. The Company has provided reliable natural gas service to Moab and Monticello  
157 for many years, and the Green River expansion did not alter or enhance service to those  
158 communities. That project was designed specifically to serve Green River and did not  
159 impact the existing infrastructure or service levels in Moab or Monticello.

160 **F. Statutory Requirements**

161 **Q. Does the application comply with the filing requirements necessary for utility**  
162 **expansion in rural Utah?**

163 A. Yes. The Company's application complies with all statutory requirements set forth in  
164 Utah Code §54-17-402.

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

166 A. Yes.

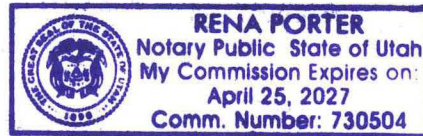
State of Utah )  
 ) ss.  
County of Salt Lake )

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.

  
\_\_\_\_\_  
Jordan Parks

SUBSCRIBED AND SWORN TO this 20<sup>th</sup> day of January, 2026.

  
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Notary Public



## CERTIFICATE OF SERVICE

This is to certify that a copy of the Rebuttal Testimony of Jordan Parks in the Matter of the Application of Enbridge Gas Utah to Extend Gas Service to Fairfield, Utah, was served upon the following persons by e-mail on January 20, 2026:

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