

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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

Docket No. 25-057-21

**DIRECT TESTIMONY OF WILLIAM S. RADFORD**

**FOR ENBRIDGE GAS UTAH**

September 3, 2025

**EGU REDACTED Exhibit 2.0**

**I. INTRODUCTION**

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

A. My name is William S. Radford. My business address is 333 South State Street, Salt Lake City, UT 84111.

**Q. By whom are you employed and what is your position?**

A. I am employed by Enbridge Gas Utah (“Enbridge Gas,” “EGU,” or “Company”) as the Manager of Compliance Engineering. I am primarily responsible for the Engineering and Project Management of various compliance type capital work programs. My qualifications are included in EGU Exhibit 2.01.

**Q. Have you testified before this Commission before?**

A. Yes. I testified in 2023 in Docket No. 23-057-13 and in 2024 in Docket No. 24-057-13.

**Q. Attached to your written testimony are EGU Exhibits 2.01 through 2.08. Were these prepared by you or under your direction?**

A. Yes, unless otherwise indicated. In that case, they are true and correct copies of what they purport to be.

**Q. What is the purpose of your direct testimony?**

A. The purpose of my testimony is to provide an overview of the required capital improvements necessary to extend natural gas service to the community of South Rim (“the Community”). This overview will include the scope of work and costs of required facility construction, the timing of that construction, and estimates on the potential number of new customers.

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**Q. How many prospective customers could receive natural gas service if the Commission approves the Application in this Docket?**

A. The Company has counted 356 potential customers in the proposed South Rim service area. The Company's review was performed by counting structures using aerial imagery in Google Earth. The Company's cost estimates assume all 356 customers sign up for gas service.

**Q. How did the Company develop the boundaries of the proposed service area?**

A. The proposed service area was developed using the results of the Company's survey of the Community. As Mr. Parks testifies in his pre-filed direct testimony, the Company conducted community outreach activities, including a survey of residents to gauge interest in receiving natural gas service. The majority of respondents indicated that they wanted natural gas service. EGU Confidential Exhibit 2.03 shows the location of the prospective customers who responded to the survey. The green pinpoints on EGU Confidential Exhibit 2.03 indicate the location of respondents who indicated they were interested in natural gas service, the yellow pinpoints indicate they may potentially be interested, and red indicates they will not be interested in natural gas service.

**Q. How many of those prospective customers have expressed interest in receiving natural gas service?**

A. At the time of this writing the total number of survey respondents is 165. One hundred and thirty-five of those indicated interest in gas service, nineteen indicated they were not interested in gas service, and eleven indicated that they were uncertain.

**Q. Have you forecast the natural gas consumption for South Rim customers pursuant to Commission Rule § 54-17-402(3)(b)(ii)(C)?**

A. Yes, the consumption usage is based on the count of total potential customers in South Rim. The gas consumption calculation is shown in the residential load calculator EGU Exhibit 2.04.

**Q. How did the Company determine the size of the HP and IHP lines that would be used to extend gas service to South Rim?**

A. The Company performed a sizing study based upon the anticipated customer demand and determined that a 6" HP pipeline, and a combination of 6", 4" and 2" diameter IHP mains should be used to serve the Community.

**Q. What did the Company do as part of the sizing study?**

A. The Company's IHP Engineering department built a gas network model of the South Rim Community to determine the required main sizing for the entire system. The Company calculated the loads driven by the potential gas customers using the residential load calculator, included as Exhibit 2.04, and applied those loads to mains in the gas network model. Lengths and position of mains were determined using location of residences based on aerial imagery. The Company accounted for regional growth in main sizing as well. The Company used this calculated load to size the HP feederline as well. A full discussion of these exercises can be found in Exhibits 2.05 and 2.06.

**Q. How did the Company estimate the total length of the service lines in South Rim?**

A. The Company developed a preliminary IHP main design in CAD and then imported the design into Google Earth. The Company identified each potential customer in Google Earth and drew a service line between the estimated future meter location and the IHP main in the road. The meter location was estimated by using the location of the propane tank and determining the most likely point where the fuel line would enter the home. The Company maintained a spreadsheet with every home address and service line length.

**Q. Did the Company select a proposed route for the HP Facilities?**

A. Yes. The Company considered two routes for the pipelines that will serve the Community. I refer to these as "Option A" and "Option B" in my testimony. The Company ultimately determined that Option A is the best route, and is seeking approval of the construction of Option A facilities. However, I have described each route below.

**Q. Please describe each of the two pipeline alignments?**

A. Pipeline Alignment Option A starts at a point just south of the Town of Stockton on Hwy 36, runs west for approximately 2,860 ft under Hwy 36, under the Union Pacific Railroad, and through private property, then north for approximately 1,280 ft through private property, then south and west for approximately 4,350 ft through private property and Bureau of Land Management (“BLM”) property. It then runs southwest along Silver Ave for approximately 8,020 feet to the estimated location of the pressure regulating station. The total designed length of the pipeline is 16,510 feet and the cost is estimated to be \$[REDACTED].

Pipeline Alignment Option B begins in the Town of Stockton on Grant Ave, runs north for approximately 280 feet, then west on Silver Ave for approximately 17,539 feet to the estimated location of the pressure regulating station. The total designed length of the pipeline is 17,819 ft and the cost is estimated at \$[REDACTED]. Both alignments are shown on Exhibit 2.07.

Option A is less costly than Option B, making it a better option from a cost perspective. Option A would require the acquisition of property rights and Option B would fall entirely within city and county roadways. Both options fall partially within areas with the possibility of hazardous materials. Both options have similar requirements in terms of permitting. Given all of these considerations, Option A is the best option for providing HP service to the Community.

**Q. What is the total estimated cost to extend natural gas service to the Community?**

A. The estimated cost for the total project is \$[REDACTED]. This amount includes construction of the HP pipeline (Option A), cathodic protection, pressure regulator station, property and easement purchases and the IHP mains and service lines. EGU Confidential Exhibit 2.08 shows the cost estimate summary for the HP facilities and the IHP facilities.

To ensure the cost estimates are as accurate as reasonably possible, significant efforts have gone into up-front design of the HP pipeline, service lines and IHP mains, including

estimated lengths and proposed installation method. This approach helped ensure that more accurate material and labor quantities went into the cost estimates.

**Q. What contracts will be required to construct the facilities you have described?**

A. For the field construction work of the project, the Company will conduct a bid process to select a prime contractor. The bids will be evaluated for cost, construction schedule, and the contractor's safety and performance metrics. Other smaller sub-contracts will be awarded to support field inspection, weld x-rays and environmental inspections.

**Q. What governmental authorizations are required to construct these facilities?**

A. Construction of the HP pipe will require construction permits from Tooele County, the Town of Stockton and the BLM, as well as a Storm Water Pollution Prevention Plan, and permitting through the Utah Department of Environmental Quality. The HP pipe will also pass through certain boundaries of a CERCLA Superfund site at Jacob Smelter which requires compliance with a Stockton local ordinance 10-16 permit. This route will also require a permit for crossing a dry lake bed from the US Army Corps of Engineers.

**Q. Have you developed a project schedule for the proposed expansion of service to Portage?**

A. Yes. I estimate that the entire project would take between 8 and 9 months to construct. If the Commission approves the project, the Company intends to commence construction during the first quarter of 2026 and expects mains to be in service by November 2026.

**Q. Will you please summarize your testimony?**

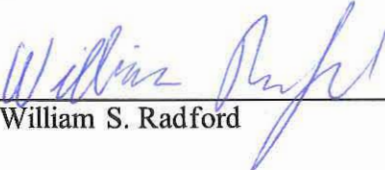
A. Yes. The Company proposes to invest \$ [REDACTED] in HP pipeline, pressure regulator station and IHP mains and services to serve the Community of South Rim, Utah. The facilities would include 16,510 feet of 6" high pressure pipeline, a pressure regulator station and 68,975 feet of IHP main to provide a distribution system for the community. The Company plans to install up to 356 services lines to any interested residents or businesses that sign up for natural gas service.

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

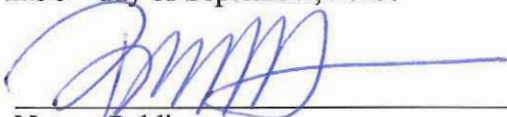
A. Yes.

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

I, William S. Radford, 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.

  
\_\_\_\_\_  
William S. Radford

SUBSCRIBED AND SWORN TO this 3<sup>rd</sup> day of September, 2025.

  
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Notary Public

