

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 SOUTH RIM, UTAH

Docket No. 25-057-21

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**REBUTTAL TESTIMONY OF JORDAN PARKS**

**FOR ENBRIDGE GAS UTAH**

January 20, 2026

**EGU Exhibit 5.0**

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2  
3 **I. INTRODUCTION**

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

5 A. Jordan Parks, 333 South State Street, Salt Lake City, Utah 84111.

6 **Q. Did you file direct testimony in this docket?**

7 A. Yes. I submitted direct testimony on behalf of Enbridge Gas Utah (“Enbridge Gas”,  
8 “EGU”, or the “Company”).

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

10 A. The purpose of my rebuttal testimony is to address certain issues raised in the direct  
11 testimony filed by Ms. Savannah Torman, witness for the Division of Public Utilities  
12 (“DPU”, “the Division”).

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

14 A. My rebuttal testimony responds to the Division’s concerns regarding the benefits of  
15 converting from propane to natural gas, economic development opportunities and  
16 customer participation. I also address the estimates the Company uses in its application  
17 for usage, revenues and cost per customer. Lastly, I address conversion costs,  
community support and safety considerations.

18 **II. RESPONSE TO DIVISION CONCERNS**

19 **A. Potential Benefits to Previously Unserved Areas**

20 **Q. The Division questions the benefits of switching from propane to natural gas**  
21 **without “regionally specific” propane pricing and argues that “more and better**  
22 **analysis of these benefits is necessary”? How do you respond?**

23 A. The Company used the most regionally specific propane prices available from the U.S.  
24 Energy Information Administration (EIA). The EIA is a reputable source for data and  
25 has been used by multiple parties in numerous regulatory proceedings. These prices are  
26 not “generic” as the Division claims, but are regionally specific to residential customers  
27 in Utah. Additionally, the Company applied the lowest recorded propane price paid by  
28 residential Utah customers since January 2024 in its calculation to ensure a

29 conservative comparison and to avoid overstating the potential cost savings of  
30 switching from propane to natural gas. The Company asserts that this approach  
31 provides an accurate and reasonable representation of the potential benefits customers  
32 may experience.

33 **Q. Did the Division propose any other regional price for the Commission to use**  
34 **instead of the EIA data?**

35 A. No.

36 **Q. Has the Company provided evidence that bringing natural gas to South Rim will**  
37 **provide additional economic opportunities?**

38 A. In a general sense, when natural gas service is extended to a community, it creates  
39 opportunities for new economic development. Access to natural gas can attract  
40 businesses that require reliable and affordable energy, support local job creation, and  
41 encourage investment in infrastructure and services. Through the community interest  
42 survey the Company conducted, it is evident that even among current residents there is  
43 interest and potential for economic growth. Beyond that, additional opportunities often  
44 arise from individuals and businesses outside the community who see new possibilities  
45 because of natural gas availability.

46 It is important to note that attracting new economic opportunities takes time and cannot  
47 be fully realized before a project begins. The Company acknowledges the Division's  
48 concerns and in future rural expansion applications, the Company will reference  
49 examples of economic development that have occurred in other rural expansion  
50 projects previously constructed, demonstrating the benefits that natural gas can bring  
51 to rural communities.

52 **B. Potential Number of New Customers**

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

55 A. Yes, however the number of potential customers alone should never be the sole  
56 determinant of whether a project is in the public interest. Larger communities like

57 Genola naturally have more potential customers, but they also come with significantly  
58 higher associated costs for infrastructure. The Company evaluates each project  
59 holistically, including cost per customer, customer density, engineering requirements,  
60 distance to extend pipeline infrastructure, distance to the Company's current operation  
61 centers, and statutory spending caps. This analysis was in the Company's Application  
62 as EGU Confidential Exhibit 1.03. South Rim's larger size means higher total project  
63 costs, however when viewed on a cost-per-customer basis, the project compares  
64 favorably to projects already approved by the Commission and other communities the  
65 Company is considering for future expansion projects.

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

69 A. While not every potential customer will choose to connect, the level of interest in South  
70 Rim is high. Of the 356 potential serviceable structures, 135 residents have already  
71 indicated they want natural gas service. That represents approximately 38% of all  
72 potential customers expressing affirmative interest before construction begins. While  
73 this percent is lower than other rural expansion projects, in the Company's experience,  
74 as residents see their neighbors get gas service, they often follow and sign up for service  
75 as well.

76 **Q. Have more customers begun receiving gas service than those who indicated they**  
77 **were interested in natural gas in past rural expansion projects?**

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

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87

	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

88

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

91 **A.** This indicates that even if customers don't fill out a survey, they could still be interested  
92 in receiving natural gas service. As residents observe their neighbors receiving natural  
93 gas service, they are often encouraged to sign up themselves. It also suggests that the  
94 total number of customers ultimately taking service will likely surpass the initial  
95 number of survey respondents who expressed interest.

96 **C. Natural Gas Usage, Revenues and Other Factors**

97 **Q. Why does the Company base its estimates of gas usage, revenue and cost per**  
98 **customer on the potential number of customers and not the number of positive**  
99 **survey respondents?**

100 **A.** The Company bases estimates on potential customers because it designs the system to  
101 have sufficient capacity to serve all potential customers as well as some growth. It is  
102 also the most reliable number available at the time of filing. While actual usage,  
103 revenue and cost per customer will differ in the early years because of actual customers  
104 being less than the potential number of customers, over time, the community could  
105 exceed these estimates as the community grows. The Company has consistently used  
106 the number of potential customers for these estimates in every rural expansion project  
107 thus far that has been approved by the Commission.

108       **Q.     Has the Company provided the cumulative impact on customer bills annually if**  
109           **both the Fairfield and South Rim projects are approved?**

110       A.     Yes. This information was provided as EGU Exhibit 1.16 in the South Rim application  
111           and EGU Exhibit 1.15 in the Fairfield application.

112                                   **D. Conversion Costs**

113       **Q.     The Division raises concerns that the Company has not adequately addressed the**  
114           **costs customers may incur to convert their appliances and suggests these costs**  
115           **could be prohibitive. How do you respond?**

116       A.     The Company has provided reasonable ranges of potential costs based on local pricing.  
117           While conversion costs vary from home to home, rates of sign-ups in other rural  
118           expansion communities suggests that for most customers these costs will not be  
119           prohibitive. The Company does not collect detailed income information from  
120           individual customers about those costs. The Company acknowledges that some  
121           customers may choose not to convert due to cost considerations, and that is expected  
122           in any voluntary program. However, many customers will proceed (and in other  
123           communities have proceeded). Natural gas offers long-term savings and convenience,  
124           and resources such as ThermWise rebates and the HEAT program are available to help  
125           offset costs for those who qualify.

126       **Q.     Does the Company believe residents with financial hardships will eventually**  
127           **become customers?**

128       A.     Yes. The Company has expanded into rural communities before the current rural  
129           expansion program was implemented. Homeowners in these prior communities not  
130           only had to convert appliances, but also had to pay for a service line. In some instances,  
131           they needed to pay extra for the community to get natural gas. Still, over time, residents  
132           and businesses made the investments necessary to get natural gas service. These  
133           communities have nearly all customers on natural gas service. The Company is  
134           confident that over time, these new rural communities will also have high participation  
135           rates.

136 **E. Community Leadership**

137 **Q. The Division asserts that South Rim does not have strong community support or**  
138 **a request from community leaders for this project. Is that true?**

139 A. No. The Company has included exhibits in support of its application that show both  
140 community support and a request from community leadership for the expansion project.  
141 EGU Exhibit 1.05 shows the initial questionnaire filed out by a community leader who  
142 expressed interest in the Company expanding natural gas service to South Rim. EGU  
143 Exhibit 1.10 shows that community support is high, with 82% of respondents being  
144 interested in receiving service.

145 **Q. Is this the first community without a mayor to support the project?**

146 A. No. In Docket No. 21-057-06 the Company received Commission approval to extend  
147 natural gas service to Goshen and Elberta. Elberta is an unincorporated community that  
148 does not have a mayor. In that docket, the mayor of Goshen spoke on behalf of the  
149 residents of Elberta.

150 **Q. The Division states that “The lack of a representative in South Rim raises safety**  
151 **concerns and the Company has not provided information concerning who would**  
152 **be responsible for providing residents information on this issue or who would**  
153 **provide safety inspections”. How did the Company deal with safety concerns and**  
154 **safety inspections in Elberta?**

155 A. The Company’s approach to safety is the same for every rural expansion project,  
156 regardless of whether the community has a mayor or other formal representative. A  
157 town representative’s role is primarily to help ensure residents are aware of the project  
158 and promote completing the interest survey, not directly managing safety. The  
159 Company communicates safety policies and procedures with residents throughout the  
160 duration of the project to ensure safe conversions from propane to natural gas. As stated  
161 in EGU Exhibit 3.0, the Company will not set a meter at a customer location until it  
162 has been inspected by the local municipality or county. The Company provides  
163 community residents with a sign-up representative and an operations representative to

164           answer customer questions and connect them with qualified contractors to perform  
165           conversion work. In addition, the Company provides safety and emergency services to  
166           residents if they smell gas or if a natural gas detector indicates the presence of gas. The  
167           Company will coordinate with the local fire department on proper response procedures  
168           for a gas leak or fire, including clearly defining the respective roles and responsibilities  
169           of the fire department and the Company during an emergency.

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

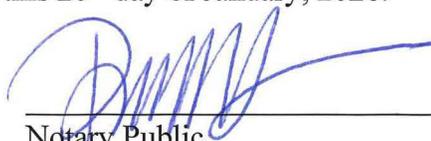
171       **A.    Yes.**

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.

  
\_\_\_\_\_  
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 South Rim, Utah, was served upon the following persons by e-mail on January 20, 2026:

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