SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Division of Public Utilities
UTAH DEPARTMENT OF COMMERCE

MARGARET W. BUSSE
Executive Director

CHRIS PARKER
Division Director

Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director
Brenda Salter, Assistant Director
Abdinasir Abdulle, Utility Technical Consultant Supervisor
Casey J. Coleman, Utility Technical Consultant
Kelley O'Connor, Utility Analyst

Date: December 17, 2025

Re: **Docket No. 25-057-24,** Enbridge Gas Utah's Replacement Infrastructure 2026 Annual Plan and Budget.

Recommendation (Acknowledge)

The Division of Public Utilities (Division) has reviewed Enbridge Gas Utah's (Enbridge or Company) Infrastructure Tracker Program (ITP) filing and has determined that it contains the required information as ordered. The Division recommends the Public Service Commission of Utah (Commission) acknowledge this filing as compliant.

Issue

Enbridge is required to file an infrastructure replacement budget by November 15 of each year. The budget covers the replacement of feeder lines (FL), belt lines (BL) (also known as High Pressure (HP) or Intermediate High Pressure (IHP) lines) respectively, and undisclosed future projects for the upcoming year. In this filing, Enbridge provided its annual plan and budget describing the estimated costs and schedule for the Replacement Infrastructure program for 2026.

Background

On December 23, 2022, the Commission issued its Report and Order in Dominion's General Rate Case, Docket No. 22-057-03, which approved the continuation of the ITP. It also provided for the continuation of the GDP deflator to be used as an index to adjust the ITP budget cap on an ongoing basis. Dominion has since been acquired by Enbridge.

On November 14, 2025, Enbridge filed its Replacement Infrastructure 2026 Annual Plan and Budget. Section 2.07 of Enbridge's tariff requires the Company to "file its next year's annual plan and budget describing the estimated costs and schedule for the Replacement Infrastructure with the Commission no later than November 15 of each year." Enbridge submitted the required forward-looking budget along with exhibits outlining the planned infrastructure replacement projects for the upcoming 2026 calendar year.

On November 14, 2025, the Commission issued an Action Request requesting the Division "Review for Compliance and Make Recommendations" with a due date of December 15, 2025. On November 18, 2025, the Commission issued a Notice of Filing and Comment Period stating that interested persons may submit comments on or before December 18, 2025. This is the Division's response to the Action Request as well as its comments.

Discussion

In 2026, Enbridge expects to replace 121,050 linear feet (LF) of feeder line (FL) and 27,660 LF of belt line (BL) pipe. The proposed schedule represents approximately a 15% increase in the LF of line to be replaced, with the BL receiving an increase of approximately 95% from 14,143 LF in 2025. The proposed budget of $91.832 million is calculated by taking the 2023 allowed budget amount of $84.7 million and adjusting for inflation as shown in Company Exhibit 5 of the application.

As indicated in the Company's Exhibit 1, $80.7 million is allocated to replacing segments of six FL's identified as: 13, 26, 34, 46, and two sections of 21 (21-13 renamed FL145 and 21-50 renamed FL122). An additional $10 million is allocated to replace BL's in Salt Lake County. The remaining balance, approximately $1.13 million, is allocated to pre-engineering studies or future work. These amounts are consistent with last year's filing.

Company Exhibit 2, page 1 identifies the LF within sections of pipe Enbridge plans to replace in the feeder line system, correlated with the date of installation and total replacement for each feeder line. Footage estimates are specified in the table below, along with the percentage of 2026 expected replacement out of total replacement footage for each FL.

Feeder Line				
FL Number		LF being replaced	Date of original installation	2026 to be replaced from total to be replaced
13		42,481	1952	99.5%
		9,129	1972-2025	10.4%
	Total	51,610		39.5%
21-13 (FL 145)		4,819	1957	
		3,097	1964	
		861	1972-2025	
	Sum	8,820		21-13 and 21-50
21-50 (FL122)		3,070	1957	11.2%
		3,218	1964	45.2%
		2	1972-2025	1.1%
	Sum	6,290		
	Total	15,110		7.5%
26		18,726	1962	37.2%
		961	1972-2025	0.4%
	Total	19,687		6.8%
34		14,671	1962	21
		4,849	1972-2025	20.1
	Total	19,520		20.4
46		8,637	1965	99.1%
		5,484	1968	99.6%
		517	1969	50.0%
		486	1972-2025	1.1%
	Total	15,123		25.2%
Grand Total		121,050		15.7%

Company Exhibit 2, page 2 identifies the sections of pipe the Company plans to replace in the IHP or BL system, correlated with the size. The Company revised the BL footages in a field data request, below is a summary of that information.

Belt Line	
Salt Lake County	
Diameter in inches	LF being replaced
24"	0
20"	0
16"	16,247
12"	3066
10"	10
8"	8,337
Total	**27,660**

No IHP replacement work is scheduled for counties other than Salt Lake in 2026.

Company Exhibit 3 offers photographs of the geographic sections where the pipe is planned for replacement. The Division requested the Company provide additional information on current maps that were identical to previous maps. For multiyear projects, the map denotes specific sections that have been completed and the section that is planned for the upcoming year.

FL13 was included in the 2025 Annual Plan and Budget but was delayed because of a property acquisition issue. Similarly, for FL145, 2025 work was delayed by a property dispute. Additionally, BL25 and BL27 were included in the 2025 Annual Plan and Budget but no work was completed and no reason for delay was provided by the Company.

Company Exhibit 4 provides a Gantt chart projecting the timeline of the replacement work. According to the chart, the work on FL13, FL46 and FL145 replacements will be completed in calendar year 2026. Work on FL26, FL34, FL122 and the BL work in Salt Lake County is expected to continue throughout the year and into next year.

Company Exhibit 5 provides information for the GDP Deflator Rate Enbridge used to annually inflate the allowed budget to the new budget amount.

Company Exhibit 6 is a description and timeline of anticipated filings over the coming year.

The Division notes that the Company has committed to continue providing quarterly reports to the Division showing the progress and costs associated with this ITP. The Company plans to continue this ITP program at this currently projected rate, as adjusted for inflation.

Conclusion

The Company's November 14, 2025, filing, outlining the Replacement Infrastructure Annual Plan and Budget for 2026, complies with the Commission's December 23, 2022, Report and Order in Docket No. 22-057-03. The Division recommends the Commission acknowledge the filing as compliant. The Division notes that this recommendation pertains to only the annual budget filing requirement identified and should not be construed in any way as an endorsement or preapproval that these costs are prudently incurred or should be recovered in the Infrastructure Tracker Program.

This filing does not request any change in the Company's current rates, nor will it have any material impact on the Infrastructure Tracker Program.

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