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Request for Extension

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director
Brenda Salter, Assistant Director
Doug Wheelwright, Utility Technical Consultant Supervisor
Ryan Daigle, Utility Technical Consultant

Date: May 29, 2025

Re: **Docket No. 25-057-T03**, In the matter of Enbridge Gas Utah's Proposed Tariff revisions to its Utah Natural Gas Tariff's No. 700

Recommendation (Request for Extension)

On April 23, 2025, the Public Service Commission of Utah ("Commission") issued an Action Request Response to the Division of Public Utilities ("Division") for a review of Enbridge Gas Utah's ("Company") request to modify Section 5.08 of its Utah Natural Gas Tariff No. 700 ("Tariff"). The Division requests an extension to the Action Request due date as the filing is more complex than previous tariff filings and to afford time for an adequate review of the potential effect on the different customer classes.

Issue

On April 23, 2025, the Company filed revised tariff sheets to change the language in Section 5.08 of its Utah Natural Gas Tariff No. 700. The proposed changes will adjust the penalty calculation to encourage compliance with daily imbalance restrictions. On May 8, 2025, the Division filed a Request for Extension to change the due date to June 9, 2025. On May 9, 2025, the Commission granted the extension for review until the requested date of June 9, 2025. The proposed change could have a significant impact on certain customers, but will not be needed until the beginning of the winter heating season.



Discussion

The Division finds the proposed change to be more significant than previous filings and would like additional time to review the impact of the proposed changes. The additional time would be used to allow the Division and other interested parties to better understand the potential impact of the proposed changes. The change could affect the gas nomination process and trading of surplus or deficit amounts between other marketing companies or customers. The Division and outside parties would like to better understand the proposed change. The Division has discussed a revised effective date of October 1, 2025, with the Company and represents there is no objection. The Company would like to have the proposed change to the Tariff in place prior to the winter heating season.

This change in Tariff language does not appear to be an attempt to collect additional penalties, but instead a method to change the behavior of certain customers and avoid potential problems in the future. This modification to penalty collection should lead to better agreements between parties with different imbalance amounts.

Conclusion

The Division requests additional time in order to provide the Commission with a more complete analysis of the potential customer impact from the proposed tariff language modification. The Division requests an extension in the Action Request Response due date to September 30, 2025. The Division has been in discussions with Company staff and the Company does not oppose this extension. A revised effective date of October 1, 2025, has been proposed but will be determined during the extended review process.

cc: Kelly Mendenhall, Enbridge Gas Utah