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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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| Formal Complaint of Richard Timothy Brandscomb on behalf of Sierra West Diamonds Corp. against Enbridge Gas Utah | <p><b><u>DOCKET NO. 26-057-05</u></b></p> <p><b>ENBRIDGE GAS UTAH'S WRITTEN<br/>RESPONSE TO FORMAL<br/>COMPLAINT</b></p> |
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Pursuant to the Utah Public Service Commission's Notice of Filing and Comment Period issued in this Docket, Questar Gas Company dba Enbridge Gas Utah ("Enbridge" or "EGU") submits this Written Response to the Formal Complaint filed on March 12, 2026, by Sierra West Diamonds Corp. ("Complainant").

**BACKGROUND**

On March 12, 2026, Complainant filed a Formal Complaint alleging that Enbridge improperly applied a retroactive billing adjustment arising from a meter-assignment error at Complainant's service location at 60 East 10600 South, Sandy, Utah. Complainant asserts that Enbridge acted in an improper and unjust manner by correcting the meter assignment and applying the billing adjustment without supplying adequate supporting documents or verifying

information. Complainant requests that the Commission require Enbridge to withdraw the retroactive charges in full.

Following the filing of the Formal Complaint, the Commission issued its Notice of Filing and Comment Period allowing Enbridge to submit a written response. The response deadline was subsequently extended by Commission order pursuant to joint stipulation of the parties to allow time for continued investigation and informal resolution discussions.

### **RESPONSE**

Enbridge denies that it engaged in any illegal, unjust, unreasonable, or improper conduct. The retroactive billing adjustment at issue was required and authorized under Enbridge's Utah Natural Gas Tariff and was applied only after field verification confirmed that Complainant's premises had been served by a crossed-meter configuration. The adjustment was accurately calculated, limited to the period allowed under the Tariff, and later reconfirmed through an additional on-site inspection conducted in April 2026.

The crossed-meter condition was initially identified on October 16, 2025, when Enbridge dispatched a field technician to the service location following receipt of a shut-off notice from Sierra West. During that visit, the technician determined that the natural gas meters serving two adjacent units were crossed such that each meter was serving the opposite unit. Enbridge promptly corrected the meter assignment in its billing system and conducted follow-up field verifications on October 24, 2025, and November 26, 2025, to ensure that the corrected configuration was accurate.

Consistent with its Tariff obligations, Enbridge thereafter corrected Complainant's historical billing to reflect the gas actually delivered to Complainant's premises during the affected period. The resulting adjustment totaled \$7,208.65 and covered the period from October

11, 2023, through October 10, 2025. This correction did not exceed the 24-month limitation imposed by the Tariff for crossed-meter billing errors.

Contrary to the allegations in the Formal Complaint, Enbridge provided supporting documentation to Sierra West via an itemized comparison showing the originally billed usage and the corrected usage by billing period. Further, Enbridge has subsequently produced the billing statements underlying the adjustment, including itemized billing information showing the originally billed usage by billing period. Enbridge has also explained the basis for the rebilling and the specific Tariff provisions requiring correction of billing errors regardless of cause.

On April 9, 2026, after the Formal Complaint was filed, and with the permission of Complainant, Enbridge conducted an additional on-site inspection at Complainant's service location to confirm the meter configuration. That inspection traced all customer gas lines and gas appliances, which verified that the meter assignment is correct and further confirmed that the corrected historical billing accurately reflects the gas usage attributable to Complainant's premises during the rebilling period.

### **CONCLUSION**

Enbridge has complied with all applicable statutes, Commission rules, Tariff provisions, and Commission orders. The crossed-meter condition was promptly corrected, the resulting billing adjustment was appropriate and made pursuant to the Tariff, the underlying billing records have been produced, and the accuracy of the meter assignment and rebilling has been repeatedly confirmed through an on-site inspections. Complainant's request of the Commission to require Enbridge to withdraw the retroactive billing adjustment in full is inconsistent with Utah law and Enbridge's Tariff obligations. For these reasons, the Formal Complaint should be denied.

By filing this Written Response, Enbridge does not waive, and expressly reserves, any and all defenses, objections, or arguments available under Utah law, the Utah Public Service Commission's rules, or the Tariff. Enbridge specifically reserves the right to raise threshold legal defenses, jurisdictional challenges, and dispositive legal arguments, including through a motion to dismiss, motion for summary disposition, motion for summary judgment, or other appropriate motion under Utah Admin. Code R746-1-301, at a later stage of this proceeding.

RESPECTFULLY SUBMITTED this 13<sup>th</sup> day of May 2026.

ENBRIDGE GAS UTAH

/s/ Cody G. Kesler

Cody G. Kesler

*Attorney for Questar Gas Company dba*

*Enbridge Gas Utah*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of May, 2026, I caused a true and correct copy of the foregoing document to be sent electronically to the following:

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