



Regular Meeting of the
Utility Advisory Committee Agenda
Thursday, June 18, 2020 – 3:30 PM

In-person attendance at public meetings is currently prohibited per the Washington Governor's Proclamation No. 20-28.4

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**Regular Meeting of the
Utility Advisory Committee Agenda
June 18, 2020 – 3:30 PM
Via Zoom Meeting**

Item	Description	Estimated Completion
I.	Call to Order	3:30 pm
II.	Roll Call	3:35
III.	Approval of Minutes	3:40
IV.	Approval of Consent Agenda* None	
V.	Correspondence and Citizen Comments on Non-Agenda Items** City’s Response to Dept. of Commerce on Incremental Cost Methodolgy	3:45
VI.	Telecommunications Utility Discussion Items None	
VII.	Electric, Natural Gas, Water, Wastewater, Stormwater Utility Discussion Items	
	a. Bureau of Reclamation/Schaake Project Update (verbal)	4:00
	b. Annual Natural Gas Safety Report	4:15
VIII.	Information Only Items	
	a. SOAR Press Release	4:30
	b. Public Works & Utilites Issues Update	4:45
IX.	Next Meeting: July 16, 2020 @ 3:30 pm location to be determined	
X.	Adjournment	5:00

***Guidelines for Consent Agenda**

Consent items have been distributed to committee members in advance for study and will be enacted by one motion. If separate discussion is desired on an item, that item may be removed from the Consent Agenda and placed on the Regular Agenda at the request of a committee member or at the request of a member of the public with concurrence of a committee member.

****Guidelines for Citizen Comment**

Time is set aside each meeting to allow citizens to address the Utility Advisory Committee on city utility issues that are not on the agenda. Please limit remarks to three minutes. The Committee will not take action when the issue is first raised, but may place the issue on a future agenda. Citizen comment on items on the agenda is also welcome. Please let the chair know you wish to speak and then wait to be recognized.

UTILITY ADVISORY COMMITTEE

February 20, 2020 (3:27 pm to 4:15 pm)

Members Present: Nancy Lillquist, Nancy Goodloe, Ed Barry, Gary Gleason and Elvin Delgado

Members Absent: Jim Goeben and Bob Johnson, no telecom items

Also Present: Ryan Lyyski, Public Works & Utility Director; Kim Caulkins, Operations Analyst; Buddy Stanavich, Power & Gas Manager; Julie Coppock, Rate Analyst; Darren Larsen, Assistant Utilities Director

These minutes are not a verbatim transcript of the meeting. This meeting was recorded, and is available for listening or copying at the City of Ellensburg, Energy Services Department, 501 N. Anderson Street, Ellensburg.

- I. **Call to Order.** Nancy Lillquist called the meeting to order at 3:27 p.m.
- II. **Roll Call.** Bob Johnson and Jim Goeben were absent due to no telecomm items.
- IV. **Approval of Minutes.** Ed Barry moved to approve the minutes. Nancy Goodloe seconded. Motion approved.
- V. **Approval of Consent Agenda.**
Motion #2020-02-01: Ed Barry moved to approve the Consent Agenda. Nancy Goodloe seconded. Motion Approved.
- VI. **Correspondence and Citizen Comments on Non-Agenda Items**
None
- VII. **Telecommunications Utility Discussion Items**
None
- VIII. **Electric, Natural Gas, Water, Wastewater, Stormwater Utility Discussion Items**
 - A. **Low income Eldery/Disabled citizen definition clarification.** Ryan Lyyski explained that the definition of low income disabled citizen has not been updated since 2013. The definition would be standardized for water, sewer, storm water, electric and natural gas utilities.
Motion #2020-02-02: Nancy Goodloe moved the committee make a favorable recommendation to City Council to adopt an ordinance instituting the proposed definition of Low Income Disabled. Gary Gleason seconded. Motion Approved.
 - B. **Low income utility rate management agreement.** Darren Larsen informed the committee that HopeSource was selected through RFP 20-01 for the management of the Low Income Utility Rate Program.

Motion #2020-01-02: Nancy Goodloe moved the committee make a favorable recommendation from the UAC to authorize the City Manager to execute an agreement, after review and approval from the City Attorney, between the City of Ellensburg and HopeSource for management of the Low Income Utility Rate Program. *Gary Gleason seconded. Motion Approved.*

- C. **CETA Incremental Cost Methodology.** Buddy Stanavich asked the Utility Advisory Committee for input to respond to The Washington Department of Commerce regarding the incremental cost methodology. If there is a cost associated for the City to comply with the legislation, there would be a 2% rate impact. Gary Gleason mentioned that Central Washington University would be interested in partnering with the City to comply.

The Committee advised Buddy to draft a response to Commerce and include it in the next agenda under correspondence.

IX. Information Only Items.

- A. **Public Works & Utilities Issues Update.** Ryan Lyyski gave updates on sewer, water and storm. Darren Larsen gave updates on electric and gas.
- B. **Intro to the Clean Energy Transformation Act Webinar.** Julie Coppock informed the committee of a free webinar February 28, 2020.
- C. **Our Environment petition for City of Ellensburg 100% clean renewable energy.** Nancy Lillquist shared that Our Environment submitted a petition to City Council proposing the City of Ellensburg be 100% renewable energy by 2035 at the latest. The Council will be discussing how to respond to Our Environment at the Council retreat March 13th.

X. **Next Meeting Date.** March 19th, 2020 at 3:30 pm in Council Conference room.

XI. **Adjournment.** With no further discussion, the meeting adjourned at 4:15 p.m.

Respectfully submitted,

Kim Caulkins

Recording Secretary

Drafted: 2/21/2020

Approved:

Clean Energy Transformation Act Rulemaking

Request for Comments – Incremental Cost Methodology

Comments requested by Feb. 28, 2020

Email comments to ceta@commerce.wa.gov

The Washington Department of Commerce (Commerce) and the Washington Utilities and Transportation Commission (UTC) will conduct a joint workshop on Mar. 17, 2020, to discuss rules to implement the provisions in RCW 19.405.060 concerning the incremental cost methodology and the 2% rate impact provision. This section of CETA has separate but similar provisions applying to consumer-owned utilities and investor-owned utilities that elect to limit their use of renewable or nonemitting resources due to rate impacts.

In preparation for this workshop, Commerce requests written comments on the questions below concerning this provision. The UTC requested comment on this topic, as it would be applied to investor-owned utilities, in a notice issued Jan. 15 in its Docket UE-191023.

Stakeholders are also welcome to provide general comments about potential rules concerning the implementation of RCW 19.405.060(4). As a convenience, this subsection is included at the end of this document.

1. RCW 19.405.060(4) requires a consumer-owned utility use its retail revenue requirement as part of its incremental cost calculation. CETA does not define “revenue requirement.” The term is defined by rule for purposes of the Energy Independence Act in WAC 194-37-040.
 - a. Should the term “revenue requirement,” be defined by rule for CETA? Should the existing definition in WAC 194-37-040 be used or adjusted for this purpose?

A.) The City of Ellensburg does not support using the WAC 194-37-040 definition of “revenue requirement”. We feel this approach would be excessively burdensome to the City’s limited resources. We suggest that rather than targeting a portion of the Utility’s annual energy sales budget, Department of Commerce employ language such as revenue requirement for purchased power only that would reflect the revenue used to meet specific targets for energy efficiency, demand response, and renewable energy (i.e. power purchases or power generation) as outlined RCW 19.405.060 (2)(a)(i). Using this approach would be more reflective of the true cost of meeting these specific targets.

- b. Are there any categories of revenue that should be specifically included or excluded if the term is defined?

A.) The City of Ellensburg is under the assumption that the purpose of RCW 19.405.060 is to reduce carbon from Washington’s generated energy while also ensuring no customer will be unreasonably harmed by increases in the cost of utility-supplied electricity in order to

comply with the standards. It therefore makes sense to define "revenue requirement" for CETA purposes to correspond to only that revenue used to cover an electric utility's power purchases and/or power generation. A utility should not be penalized for meeting necessary business and operational needs such as: upgrading fixed assets, enhancing grid modernization, or upgrading reliability and safety operations.

- c. Is it common practice for a consumer-owned utility to establish a calendar-year revenue requirement as part of their budget process? Is the revenue requirement revised during a year? If so, should these revisions affect the calculation under RCW 19.405.060(4)?

A.) It is not common, but also not unheard of, to adjust revenue requirements mid-year. An example would be if the Bonneville Power Administration would initiate a Cost Recovery Allocation Clause (CRAC) resulting in a major increase in BPA power rates. Under the definition proposed by the City of Ellensburg, an increase in power purchase costs would affect the downstream revenue requirement under CETA.

Using the approach proposed by the City of Ellensburg, any other increase not associated with power purchase costs would not result in changes to the CETA revenue requirement imposed on the City. It is common practice to develop an annual revenue requirement.

The City of Ellensburg sets a biennial budget; the revenue requirements for the two following years are developed. Given no large, unforeseen expenditures such as BPA rate increases, CRAC, Financial Reserve Policy (FRP), emergency capital expenditures, the revenue requirements are not changed.

2. With regard to the 2% rate impact provision in RCW 19.405.060(4)(a):

- a. If a utility relies on this compliance option, should incremental costs be determined based on a forecast, at the time the utility submits its Clean Energy Implementation Plan? Should compliance be determined based on actual expenditure data at the conclusion of each four-year period? Should there be a provision for interim reporting during the four-year period?

A.) The City of Ellensburg believes that incremental costs should be based on a forecast, with compliance determined at the conclusion of each four-year period; this could also include a high-level mid-period dashboard report. This mid-term report would help the Utility as well as the Department of Commerce evaluate the on-going costs of compliance.

- b. If compliance is based on a forecast of costs, and the utility's actual incremental costs increase more or less than 2% per year averaged over the four-year period,

should a true-up mechanism be provided to reconcile the differences between the actual and the forecasted incremental cost?

A.) The City of Ellensburg supports compliance based on forecasted costs with a true-up mechanism at the end of the four-year compliance period.

Additionally, since there are often “trailing costs”, the City recommends the reporting period include a “period of time” after the close of the four-year period.

3. When using the 2% rate impact compliance option, RCW 19.405.060(4)(a) requires all costs be directly attributable to the actions necessary to comply with RCW 19.405.040 and RCW 19.405.050. How should a utility demonstrate that each cost is “directly attributable to actions necessary,, for the utility to comply with those two standards?

A.) Ensuring that no customer is unreasonably harmed by increases in the cost of utility-supplied electricity in order to comply with the standards. Costs would be directly attributable if those costs:

- *reduce energy usage (Energy Efficiency),*
- *shift peak loads (Demand Response),*
- *reduces carbon content in the utility’s purchased or generated power (Renewable Energy),*
- *lessens the rate impact on vulnerable populations, and*
- *increase the administrative costs to track such activities.*

Examples include, but are not limited to, energy efficiency programs, weatherization programs, demand response programs, purchase of Renewable Energy Credit’s (REC’s), discount programs to low income customers, and staff time/resources to track such activities.

The gross energy conservation rate-based moneys paid by consumer-owned utilities to BPA should be directly tracked to actions necessary to support the CETA requirements; many consumer-owned utilities fund their energy efficiency programs by drawing on funds embedded in BPA rates for just that purpose. BPA takes these funds and returns them, less amounts for the administration costs. Because consumer-owned utilities ‘outsource’ a part of their energy conservation to BPA, it makes sense that the gross amount taken by BPA is focused on energy conservation.

4. RCW 19.405.060(4)(b) states that if a utility relies on the 2% rate impact option and has not used 80% renewable or nonemitting resources, it must demonstrate that it has maximized investments in renewable resources and nonemitting electric generation prior to using an alternative compliance option under RCW 19.405.040(1)(b).
- a. How should a utility make this required demonstration that it maximized investments?

A.) The City of Ellensburg believes the effort to reduce carbon in the power supply will demonstrate maximized investment. There are no clear-cut better or worse investments; it is all subjective.

More importantly, flexibility toward utilities to meet compliance in a way best fitting with their utilities, consumer-owners, and ratepayers. The rules cannot be so restrictive as to severely limit local choice and force utilities to choose less successful or more costly methods.

- b. Should this provision be interpreted to prohibit any use of alternative compliance options if the utility has not used renewable or nonemitting resources for at least 80% of retail electric sales in Washington?

A.) No, alternative methods should not be prohibited. As stated in our response to 4(a), it is imperative that flexibility be factored into this Statute. This will allow smaller, more rural utilities to choose the option that best suits their limited resources.

5. Should the requirements for use of the 2% rate impact option differ with respect to interim targets for periods prior to 2030, established based on RCW 19.405.060(2)(a)(i), as compared to the requirements applicable for compliance periods starting in 2030.

A.) Yes, requirements should differ for periods before 2030. These requirements are a major change for electric utilities. There must be a "ramp up" period for utilities leading up to 2030 to meet CETA requirements. Considering the rules will be finalized in 2021, there will be a learning curve of several years that involves both the rule-making bodies and the utilities as they each determine how to navigate.

General Comments

- 1) *The City of Ellensburg is located in the middle of Washington State surrounded by agriculture land and mountains. While the rural setting makes living in Ellensburg a pleasure, the city, like most rural municipalities, faces difficult challenges that urban locations do not have. It is much more difficult to attract businesses, jobs, and qualified workers. Low job and wage growth also means that over time a greater percentage of ratepayers will be unable to support the rate impacts required by this law. In addition, of course, smaller electric utilities do not have the work force and bandwidth to handle ever-expanding requirements with large overhead and ramp-up constraints.*

2) *We believe it was not the intention of this legislation to bankrupt rural areas. As the rule making process continues, the City of Ellensburg asks that legislation implementation does not penalize rural areas, and particularly BPA full requirements consumer-owned utilities and the customers they serve. This Statute has the potential to adversely affect smaller utilities by imposing actions that will increase cost and workload in utilities, communities, regions, etc. that have limited population and bandwidth to support the increased requirements.*

RCW 19.405.060 excerpt

(4)(a) A consumer-owned utility must be considered to be in compliance with the standards under RCW [19.405.040](#)(1) and [19.405.050](#)(1) if, over the four-year compliance period, the average annual incremental cost of meeting the standards or the interim targets established under subsection (2) of this section meets or exceeds a two percent increase of the consumer-owned utility's retail revenue requirement above the previous year. All costs included in the determination of cost impact must be directly attributable to actions necessary to comply with the requirements of RCW [19.405.040](#) and [19.405.050](#).

(b) If a consumer-owned utility relies on (a) of this subsection as a basis for compliance with the standard under RCW [19.405.040](#)(1), and it has not met eighty percent of its annual retail electric load using electricity from renewable resources and nonemitting electric generation, then it must demonstrate that it has maximized investments in renewable resources and nonemitting electric generation prior to using alternative compliance options allowed under RCW [19.405.040](#)(1)(b).



AGENDA REPORT

DATE: June 18, 2020
TO: Utility Advisory Committee
THRU: Darren Larsen, Assistant Utilities Director
FROM: Darin Yusi, Gas Engineer
Heather Forgey, Gas Engineering Specialist
RE: Annual Natural Gas Safety Survey Report

SUMMARY: Each year the City Gas Division conducts a phone survey to measure the effectiveness of the natural gas safety Public Awareness Program. The first survey was completed in 2007 and was the original benchmark to compare future years. A new benchmark was established in 2019 using a 10-year average, thus allowing for a better overall comparison for future years. The overall results of this year's survey indicate that the Public Awareness Program continues to be effective.

BACKGROUND: The City of Ellensburg adopted the American Petroleum Institute (API) Recommended Practice 1162 in support of our natural gas safety Public Awareness Program. The effective date for full implementation of the Public Awareness Program was June 20, 2006. Management and staff are committed to providing a safe and reliable natural gas service to our customers and ensuring the safety of those living and/or working near our natural gas pipelines.

The Public Awareness Program is a critical component of our overall safety efforts. Every Natural Gas Division employee is committed to fulfilling our responsibilities as described in our Public Awareness Program.

As part of the Public Awareness Program, the City provides safety messages in utility bills, on the City's website, on the radio and in the newspaper to make sure customers and citizens know what to do in case of a natural gas emergency. This year's phone survey began on April 30, 2020, included 12 questions, and took about a minute to complete. Customers that did not want to be called were invited to contact the City to be removed from the call list.

ANALYSIS/FINDINGS: The survey results showed a positive increase in all questions when compared to the previous year. When compared to the 10 year average there was a substantial increase in several questions with a few questions still below the average. In particular, questions 9, 10, and 11 (knowledge based questions) showed a slight decrease. It is anticipated that with several questions related to respondents receiving natural gas safety information showing a strong increase, that questions 9, 10, and 11 will continue to show incremental increases, as they did from 2019 to 2020. The overall results seemed to show that we are effective in getting information to the public, but less effective in the review and retention of that information. One goal will be to continue to analyze and look at ways we can get the public more engaged in the information being presented.

The goal is to always be improving in our effectiveness of the Public Awareness Program. A summary of the survey questions including the 10 year average, 2019 and 2020 results are attached.

RECOMMENDATION: For information only, no action requested.

Annual Natural Gas Safety Survey Report

#	Survey Question	10Yr Avg (2008 - 2017)	2019	2020
	Homes called for this survey.	7,986	9,000	8,825
	Respondents who completed the entire survey.	587	417	642
	Percentage of full response.	7.28%	4.63%	7.27%
1.	Respondents who have natural gas service at their home.	41.47%	52.92%	66.89%
2.	Respondents who know the gas company's name is City of Ellensburg.	47.97%	65.73%	68.80%
3.	Respondents who have heard or received information on natural gas safety from City of Ellensburg in the past 12 months.	29.75%	37.63%	41.55%
4.	Respondents who have received written natural gas safety information with a gas bill in the past 12-months.	28.58%	33.83%	62.34%
5.	Respondents who have read about natural gas safety information in local print ads or articles.	24.51%	41.54%	47.61%
6.	Respondents who have heard natural gas safety information through public service messages on a phone call, television or the radio.	24.04%	41.43%	53.32%
7.	Respondents who have read about natural gas safety information on the City of Ellensburg's website or social media.		15.72%	18.04%
8.	Respondents who think they would recognize a natural gas leak by being able to smell it.	76.30%	78.18%	81.16%
9.	Respondents who would leave the area and call 911 from a safe distance if they smelled gas anywhere.	95.55%	90.78%	91.53%
10.	Respondents who think they would recognize a natural gas leak by the hissing sound.	62.28%	56.25%	60.70%
11.	Respondents who would light a match if they smelled gas.	2.37%	5.63%	3.86%
12.	Respondents who have heard that they or an excavator company should call a center number prior to digging, to avoid accidentally hitting a natural gas pipeline.	91.64%	94.00%	95.17%

Attachment 1

FOR IMMEDIATE RELEASE
CONTACT: Erin Kurilla, Vice President of Operations & Safety
Phone: (202) 905-2904
Email: ekurilla@apga.org

APGA Congratulates the City of Ellensburg Natural Gas Utility for Operational Excellence!

Washington, DC- (May 6, 2020) - The American Public Gas Association (APGA) presented the City of Ellensburg Natural Gas Utility with the prestigious APGA System Operational Achievement Recognition (SOAR) for excellence in operating its natural gas utility. Public natural gas systems are entrusted by their customers to deliver clean and affordable natural gas through a safe and reliable distribution pipeline system. To accomplish this mission, a forward thinking natural gas utility constantly strives to improve its operating capabilities, overcome challenges and adapt to its changing environment.

Out of approximately 750 APGA members, the City of Ellensburg Natural Gas Utility was selected for SOAR level Bronze by its peers on the APGA Operations and Safety Committee. The selection was based on demonstrated excellence in the four areas of system integrity, system improvement, employee safety, and workforce development.

System integrity refers to the natural gas distribution system performing its overall intended function safely, efficiently and effectively—distributing energy to all customers without being degraded or impaired by its internal or external environment. System improvement refers to keeping the natural gas system well maintained and up-to-date through a self-improvement program that includes both an eye on the future through research and development, technology integration and a commitment to system improvement programs. Systems that exhibit excellence in employee safety include adopting a safety program that includes policies and procedures for education involvement and accountability for all employees, as well as tracking safety performance. Lastly, workforce development focuses on creative recruitment, training, education and development practices that provide a return on investment through increased employee loyalty, motivation, safety and productivity.

APGA President and CEO Dave Schryver remarked, “The City of Ellensburg Natural Gas Utility was highly rated in all four areas that are required of SOAR. The City of Ellensburg Natural Gas Utility consistently demonstrates a commitment to providing natural gas safely and efficiently to all those in their community and as such, serves as a model for all other natural gas utilities in the country. APGA is proud to recognize the City of Ellensburg Natural Gas Utility and is confident in their continued success.,,

The City of Ellensburg Natural Gas Utility was one of twenty-five SOAR recipients recognized in 2020, joining the 39 previous SOAR award recipients. The system also received a plaque signifying the City of Ellensburg Natural Gas Utility’s commitment to and achievement in excellence in operating a natural gas utility system.

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APGA is the national association of municipally and publicly-owned local distribution systems. There are about 1,000 public gas systems serving more than 5 million customers. These public gas utilities are not-for-profit retail distribution entities that are owned by, and accountable to, the citizens they serve. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies that have natural gas distribution facilities.

Ellensburg Utility Advisory Committee
Public Works & Utilities Issues and Updates
June 18, 2020

Consent Items

Agenda Reports for items approved by the City Council since our last meeting are attached.

Sewer

- Brad Coffey has been selected to replace Eric Nuemeyer as the WWTF foreperson. Eric accepted a wastewater position with the City of Selah and began his new job April 16, 2020. Brad started his career with the City of Ellensburg Sewer division in October 2009. Brad is a Department of Ecology certified level 3 wastewater operator. He assumed the foreperson duties on June 16, 2020.
- The collection crews are currently working on the 2020 spring/summer jet list.

Water

- Leak detection of the entire distribution system is nearly complete. Water staff continue to make repairs of the leaks that were found.
- The Water Use Efficiency Report, and the Water Quality Report have been submitted to the Washington State Department of Health Drinking Water Division. The Water Quality Report will be mailed out to all City Customers this month and is also available on the City's webpage.
- The Department of Health has notified the City that they will be conducting a sanitary Health Survey of the city's water system on a date yet to be determined. The Department of Health conducts this survey once every 5 years on public water systems.
- Illinois Well design/associated piping are well underway. Staff is hoping to put project to bid this fall for spring 2021 construction.

Storm

- Staff has completed the SEPA/critical areas/development review application for the new bridge and levee on Dolarway. Ecology visited the site on May 20th and determined there were no wetlands found within the project area. The City does not have to hire a wetland biologist or do any delineations. The project can now move forward.
- Gateway I design is moving into the 60% phase and will be done by July 1, 2020.
- Staff is very engaged in the recent COVID 19 outbreak as this will have a direct effect on permit compliance, scheduling and programs. Staff met with Ecology and ECY is not giving permittees any leniency towards compliance. City Staff met with operation and maintenance on June 5th and the inspection and cleaning program is up and running. City staff has started back up the Illicit Discharge/Detection and Elimination program. Minus losing out on some outreach/education events in April and May, the City should be in good shape by annual report time.

Electric

- Staff has been working with TCF on a reasonable-time to enter facility and perform maintenance on our system which will allow them to perform maintenance on their system. Staff was reluctant to enter

facility on scheduled outage date due to recent outbreak. This work is tentatively scheduled for the end of June.

- The Power & Gas Manager and Assistant Utilities Director participated in the May WPAG meeting remotely.
- The Rate Analyst and/or Power and Gas Manager participated in the CETA Markets Group Workshop on May 13th, May 21st and June 9th remotely.
- The Rate Analyst and Power and Gas Manager participated in the BPA Carbon Forum Meeting on May 11th remotely.

Gas

- The Corrosion Control Evaluation on the City's gas system by Coffman Engineer's is complete and we have received a final report. A staff report will be given at the next scheduled UAC meeting.
- Staff is gathering data for the Natural Gas Utility COSA to provide to the consultant.
- Annual regulator station maintenance was finished in April and annual valve maintenance began in April and continued through May and into June.
- The City's Natural Gas Division has been recently been selected as one of twenty-five System Operational Achievement Recognition (SOAR) recipients recognized in 2020 by the American Public Gas Association (APGA). Out of approximately 750 APGA members, the City of Ellensburg Gas Division was selected for SOAR level Bronze by its peers on the APGA Operations and Safety Committee. The selection was based on demonstrated excellence in the four areas of; system integrity, system improvement, employee safety, and workforce development. The APGA press release is attached.
- Staff solicited from consultants a Request for Qualifications for a Natural Gas System Plan Update in June. EN Engineering has been selected and we will begin negotiating a contract and finalizing a scope of work.
- Staff participated in a Utilities and Transportation Commission (UTC) Annual Review Audit on June 3rd. Some follow up information was requested by the UTC and sent. No violations were noted. We should receive a letter from the UTC within a couple weeks explaining their final results.
- Staffing of the Gas Division is at full operation for the crews. Engineering and operations staff continue to practice both telecommuting and working in city hall.