

December 30, 2015

Utah Public Service Commission
Heber M. Wells Building
P.O. Box 45585
Salt Lake City, UT 84111-5585

Re: *Questar Gas Company Comments to Notice of Proposed Rule Amendment R746-409*

Dear Commissioners:

Questar Gas Company (Questar Gas or Company) respectfully submits the following comments in response to Utah Public Service Commission's (Commission) Notice of Proposed Rule Amendment issued on November 6, 2015.

Proposed R746-409-2

Questar Gas also notes that in subsection M.3., the Commission proposes to require reporting for incidents that result in "property damage of \$15,000 or more . . ." The Code of Federal Regulation only requires such reporting for incidents resulting in property damage of \$50,000 or more. Questar Gas recommends the Commission modify subsection M.3. to require reporting for incidents resulting in damage of \$50,000 or more to ensure consistency with the applicable federal regulations.

Finally, with respect to subsection M.6., the Commission proposes to require reporting when news media is covering an event. Questar Gas recommends the Commission strike subsection M.6. because personnel on site are occupied with addressing the incident, not identifying others present on the scene. The Company does not believe that Company employees' attention should be diverted from these tasks to assess whether media is present or not, and to report upon that presence.

Proposed R746-409-3

The Company recommends that proposed R746-409-3.C. be reworded to state: "the Commission may require the Utility to testing of portions of intrastate pipeline facilities . . ." to make clear that the Utility shall perform such testing, not some other entity or agency.

Additionally, the Company recommends striking proposed R746-409-3.D. because it is duplicative of existing enforcement mechanisms and is therefore unnecessary. The referenced provision is also vague as to who would "authorize" such an inspector.

Proposed R746-409-4

The Company recommends modifying the proposed R746-409-4.B.2. to require such reporting “as soon as reasonably practicable, and after addressing emergency conditions” rather than requiring such reporting “at the earliest practicable moment.” The Company prefers that on-site employees focus on abating emergency situations first, and reporting promptly thereafter. “The earliest practicable moment” could be read to suggest that employees should satisfy reporting requirements concurrently with or prior to addressing safety concerns. The Company’s proposed change would clarify that the Company personnel should address safety first, and reporting promptly thereafter.

Questar Gas notes, with regard to R746-409-4.E., that the proposed language is vague as to what a “special report” is or would contain and requests clarification as to what such reports would be and what information would be contained therein.

Questar Gas appreciates the opportunity to comment upon the proposed rules.

Sincerely,

Jennifer Nelson Clark

/JNC