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Attorneys for Questar Gas Company

|  | )           |  |
|--|-------------|--|
| In the Matter of                                   | )           | Docket No. 98-057-12                           |
| THE APPLICATION OF QUESTAR GAS                     | )           |  |
| COMPANY FOR APPROVAL OF A                          | )           |  |
| NATURAL GAS PROCESSING AGREEMENT                   | )           |  |
| In the Matter of<br>the Application of Questar Gas | )           | QUESTAR GAS COMPANY'S<br>MOTION TO CONSOLIDATE |
| To Adjust Rates for Natural Gas Service in Utah    | )<br>)<br>) | Docket No. 01-057                              |

## - BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

Pursuant to the Remittitur of the Utah Supreme Court, issued on November 15, 2001, in *Questar Gas Company v. Public Service Commission*, 2001 UT 93 (No. 20000076-SC) ("the Appeal"), the issue addressed by the Court is now back under the jurisdiction of the Utah Public Service Commission.

The Court concluded that the 191 Account procedure set forth in Questar Gas Company's Commission-approved tariff is a legal and proper mechanism for the recovery of gas-treatment costs such as the removal of carbon dioxide  $(CO_2)$  from Questar Gas's system supplies. Accordingly, Questar Gas is seeking approval to include in Account 191 a portion of such  $CO_2$  costs booked to Account 813 for the period June 1, 1999, through August 10, 2000, but previously

excluded from Account 191 by the Commission's December 3, 1999, order in this docket.

Because Questar Gas is, concurrent with the filing of this Motion to Consolidate, filing its regular semi-annual pass-through application to be effective January 1, 2002, it has included in that filing and the accompanying exhibits the effects of implementing the Court's decision in the Appeal, combined with the normal rate adjustments that are made pursuant to the approved 191 Account procedures.

As set forth in the December 14, 2001 application, Questar Gas has included \$5,349,509 in costs that have been booked to Account 813 but not debited to Account 191 for CO<sub>2</sub>-removal costs incurred from June 1, 1999, through August 10, 2001. In Addition, related carrying costs of \$414,546 have been included.

For the sake of administrative efficiency and in recognition of the Court's approval of 191 Account procedures for the recovery of the  $CO_2$ -removal costs, Questar Gas believes that a consolidation of the two captioned dockets is proper and in the public interest. This consolidation presents no problem with respect to any non-related issues in Docket No. 98-057-12. There are none, as the only unresolved issue in that docket is the appropriate treatment of the  $CO_2$  costs through Account 191 procedures.

WHEREFORE, Questar Gas Company respectfully moves the Commission for an order consolidating the two referenced dockets.

Respectfully submitted this  $14^{th}$  day of December 2001.

JONATHAN M. DUKE QUESTAR REGULATED SERVICES COMPANY

Gary G. Sackett Jones, Waldo, Holbrook & McDonough

Attorneys for Questar Gas Company

## **CERTIFICATE OF SERVICE**

I certify that, on the 14<sup>th</sup> day of December 2001, I caused to be hand-delivered or sent by first-class mail, postage prepaid, a correct copy of the foregoing MOTION TO CONSOLIDATE to the following:

Committee of Consumer services: Reed T. Warnick Assistant Attorney General Heber M. Wells Building 160 E. 300 S. P.O. Box 45807 Salt Lake City, UT 84145-0807

Salt Lake City, Utah

DIVISION OF PUBLIC UTILITIES: Michael L. Ginsberg Assistant Attorney General Heber M. Wells Building 160 E. 300 S. P.O. Box 45807 Salt Lake City, UT 84145-0807

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TONI E. HARRIS