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BEFORE THE

PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Approval of the) Docket No. 05-057-T01 Conservation Enabling Tariff Adjustment) Option and Accounting Orders) QUESTAR GAS COMPANY DEMAND SIDE MANAGEMENT PROGRAM V EVALUATION COMMENTS

Pursuant to the Notice of Request for Filing of Comments issued August 10, 2007, by the Public Service Commission of Utah (Commission) in this docket, Questar Gas Company (Questar Gas) respectfully submits its comments regarding the adequacy of the Division of Public Utilities' (Division) proposed Evaluation Plan of Questar Gas' Demand Side Management (DSM) Pilot Program.

The Division's proposed Evaluation Plan (Evaluation Plan) contemplates various types of analysis at different times over the expected term of the DSM Pilot Program. It is the Company's position that the Evaluation Plan is comprehensive, and if approved, would result in <u>cost-effective</u> and meaningful evaluations of Questar Gas' current, and potentially future, DSM programs.

Furthermore, the Evaluation Plan is more than adequate to implement a DSM-program evaluation and is consistent with and exceeds the requirements outlined in the Commission Order dated January 16, 2007. The Evaluation Plan will also ensure Questar Gas' DSM pilot programs are designed and implemented based on industry practices, which include efficient and effective strategies and methodologies, and financial savings for Questar Gas customers.

Program evaluations are useful business and regulatory tools to ensure cost-effective programs through tracking and reporting program participants and verification and analysis of program estimated savings. In addition, it is just as important for ongoing cost-effectiveness to obtain program-improvement information from process evaluations early on in program implementation to ensure that customers are receiving the maximum benefit from program funding. The Evaluation Plan accomplishes all of these evaluation criteria and more.

Furthermore, Questar Gas hosted six separate DSM Advisory Group meetings on January 31, 2007, March 7, 2007, April 4, 2007, May 10, 2007, June 6, 2007 and June 28, 2007. These meetings were attended by interested stakeholders, including representatives from the Division, Commission Staff, Utah Committee of Consumer Services (Committee), Utah Clean Energy (UCE), Salt Lake Community Action Program (SLCAP), Southwest Energy Efficiency Project (SWEEP), Low Income Weatherization Program (LIWAP), State Energy Program (SEP) and Questar Gas. These meetings were primarily focused on research, discussion and development of the Evaluation Plan. During one meeting, the group participated in a discussion with an industry-leading program evaluator - Brian Headmann, from Quantec, LLC. In addition, the DSM Advisory Group participated in the development of the Evaluation Plan. The Evaluation

Plan filed with the Commission is a result of the DSM Advisory Group meetings, the Quantec presentation and group discussions and comments.

For the reasons stated above, the Company respectfully requests that the Evaluation Plan be approved. Should the Commission determine that the Evaluation Plan be changed in any material manner, the Company requests the opportunity for it and members of the DSM Advisory Group to provide comments on any changes or alterations to the Evaluation Plan before a final order is issued.

RESPECTFULLY SUBMITTED: August 24, 2007.

C. Scott Brown Colleen Larkin Bell Questar Gas Company

Gregory B. Monson Stoel Rives LLP

Attorneys for Questar Gas Company

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of QUESTAR GAS COMPANY

DEMAND SIDE MANAGEMENT (DSM) PROGRAM EVALUATION COMMENTS was

served upon the following persons on the service list by electronic mail on August 24, 2007.

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I also served the above comments upon the members of the Natural Gas DSM

Advisory Group by electronic mail on August 24, 2007.

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