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12 May 2006

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Joint Application of Questar Gas Company, the Division of Public Utilities, and Utah Clean Energy for Approval of the Conservation Enabling Tariff Adjustment Option and Accounting Orders	Docket No 05-057-T01 SURREBUTTAL ARGUMENT OF ROGER BALL IN SUPPORT OF HIS REQUEST FOR AN INTERIM RATE DECREASE

1 INTRODUCTION

The Joint Application was not, as the joint applicants initially portrayed it, a simple tariff adjustment capable of determination in an expedited thirty-day process. Nor is it simply a single-item rate case: it includes many aspects of all phases of a general rate case. Many of those aspects demand detailed examination: neither the Joint Application nor the Rate Reduction Stipulation filed by some of the parties on 10 May 2006 ensures that the revenues and expenses associated with them are considered in a sufficiently balanced way to result in just and reasonable rates.

Consequently, I have respectfully requested that the Commission convert this Docket into a general rate case within which the Joint Applicants' requests can receive the consideration they deserve. I have not asked the Commission to *initiate* a rate case,

although it is certainly appropriate for any customer who believes rates are improper to petition the Commission for relief.

Within the scope of a general rate case, I anticipate showing that Questar Gas Company is over-earning by a very large margin. Passing its regulatory expenses, including the Public Utility Regulation Fee, on to customers in rates is patently illegal; at least part of the profits from Questar Pipeline Company should be imputed as revenues to Questar Gas; and all of the profits from Wexpro should be imputed to Questar Gas. Additionally, Questar Gas has failed to fulfill its obligation to serve because it has not developed sufficient Company-owned gas resources to meet its growing load.

Questar volunteered, and the Utah Division of Public Utilities agreed, in the Joint Application that a $10.2M rate decrease would be appropriate. It was not contingent upon approval of the other requested tariff changes. I have asked the Commission to put that decrease into effect on an interim basis pending the full investigation of a general rate case. Making the decrease interim protects both customers and Questar. That all the parties to the Stipulation, including Questar and the Division, have agreed between themselves that a $9.7M permanent rate reduction, not including any concession on rate of return, is reasonable quite separate from consideration of the other aspects of the Joint Application lends further credence to my positions that the reduction was not contingent upon approval of the other requested changes and that an $10.2M interim reduction would be no unreasonable imposition on the Company.

In the presence of all three members of the Commission, and three members of its staff, at the 20 January technical conference, the Division's Energy Group Manager, Dr

Powell, indicated that it doubted its ability, or lacked the will, to require Questar to provide projected numbers for an evaluation of a future test-year evaluation of earnings, and had joined the Application, in part, to win the Company's agreement to provide the information. Having joined Questar in this Application, and further having now joined the Company again in the Stipulation, the Division cannot claim to be able to act as the statutory impartial investigator in this matter. I therefore asked the Commission to order Questar to disclose all the relevant information to all the parties in this Docket.

The Commission has given notice that it will hear evidence and argument on the Stipulation on 17 May. However, it has no motion before it regarding the Stipulation and I respectfully move that the Commission dismiss it.

2 A RATE DECREASE IS NOT CONTINGENT UPON APPROVAL OF THE OTHER REQUESTED TARIFF CHANGES

On 16 December 2005, Questar, the Division, and Utah Clean Energy jointly applied to the Commission for expedited approval of far-reaching changes to the Company's Tariff to be effective from 1 January 2006, together with enabling accounting orders and a rate reduction.

(On the previous morning, 15 December 2005, Barrie McKay of Questar had appeared before the Utah Committee of Consumer Services during its open meeting to describe the application. Division Director Constance White and Clean Energy Executive Director Sarah Wright also attended that meeting.)

In its rebuttal argument, which it filed on 28 April 2006 – without requesting or receiving Commission permission, a week late – Questar characterizes the rate reduction variously as "associated" with "approval of the Conservation Enabling Tariff and Demand Side Management during a three-year pilot program" and as "a modest rate decrease made possible as a result of this alignment" of "the interests of the Company, its customers, regulators and other interested persons". It claimed that:

> Beginning with the Application and continuing through the workshop, the technical conferences and the testimony filed, Joint Applicants have made it clear that the rate reduction proposed in the Application is contingent on approval of the tariff changes and issuance of the accounting orders requested in the Application.

Yet one may search the Application and testimony and find the word "contingent" only once, the Division's qualification that:

> The acceptance of the ASL method and its rates or other methods and their rates is subject to and contingent upon a more detailed examination and review of current and future information if and when it is generated, having to do with depreciation accounting methods.

On a previous occasion, Questar declared that:

> The Committee is charged with advocating "positions most advantageous to a majority of residential consumers as determined by the committee and those engaged in small commercial enterprises."[1] The statute recognizes that residential and small commercial customers are not a homogenous group with unanimously held views of what will be advantageous to them in regulatory proceedings. The statute creates a Committee composed of six individuals appointed by the Governor, representing the interests of various aspects of this large group of customers.[2] The Committee then studies issues and determines the positions most advantageous to a majority of its constituency.

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1 *See* Utah Code Ann. § 54-10-4(3).

2 *See id*. at § 54-10-2.

When Mr McKay appeared before the Committee on 15 December, the day immediately preceding that on which the joint applicants filed their request with the Commission, he repeatedly, publicly, and on the record, assured it that no strings were attached to the rate reduction. I detailed his remarks in my 31 March Argument in this Docket.

Try as I might, I have been unable to reconcile the weight Questar gives to the role of the Committee with the distinct clash between what Mr McKay told it about the rate reduction – "no strings attached", before even mentioning the so-called "Conservation Enabling Tariff" – and what the Company has since claimed – that it was "contingent upon approval of the tariff changes". However much Questar has protested contingency since I asked the Commission for interim rate relief on 2 February 2006, the evidence is that Mr McKay denied any such link, and none of the Joint Applicants' other representatives claimed one, previous to that date.

Questar wants us to believe that the Committee is the only legitimate representative of the Company's some 800,000 customers. Yet its representative either carelessly or deliberately misled the Committee on a crucial aspect of an application, that "was the culmination of three years of work on these issues by task forces established in Docket No. 02-057-02", and that was to be filed the very next day? Either Questar sent Mr McKay to practise verbal prestidigitation before the Committee, or the Company decided only after 2 February 2006 that the rate decrease was inextricably linked to the rest of its proposed tariff changes. I respectfully urge the Commission to think deeply before taking any action which might encourage utilities to believe they have free rein to be anything other than straightforward with the Committee. And if Mr McKay's 15

December representations properly characterized Questar's position at that time, I similarly encourage the Commission to require that the Company now stand up to the obligations it entered into then.

3 MY REQUEST, NOT DEMAND, FOR CONVERSION TO, NOT INITIATION OF, A GENERAL RATE CASE IS ENTIRELY PROPER

On 2 February, I asked the Commission to convert these proceedings into a general rate case, pointing out that there was "de facto acceptance that the issues surrounding" the request were complex, and that the Joint Applicants had themselves "modified their anticipation of a hearing within 30 days." In pertinent part, I then argued that:

> 3 The application contemplates tariff changes based upon adjustments compared with its last general rate case in Questar Gas Company's depreciation, cost of borrowing and rate of return – all elements in the Commission determining an approved revenue requirement – allocation between customer classes – rate spread – and recovery through general and pass-through rates – rate design.
>
> 4 These are changes of sufficient complexity, indeed they would comprise a substantial part of a general rate case, that they ought not to be contemplated outside a general rate case.
>
> 5 From a policy perspective, the effect of the joint application will be to shift financial risk from stockholders to customers. This should not be contemplated without a comprehensive investigation of the Company's authorized rate of return on equity.

While the Commission has made no comment, much less a ruling, on this request, it, too, appeared to recognize the complexity of the Joint Application in its 3 February bench order staying its 1st Amended Scheduling Order, and in its 2 March 2nd Amended Scheduling Order. Questar, however, is implacably opposed to my request, and has advanced several arguments in its effort to persuade the Commission to reject it.

Its late-filed rebuttal claims that: “Mr Ball is the only party to demand initiation of a general rate case, and he has no authority to do so.” Questar again proves the point I made in my 20 March Reply: “We have repeatedly seen demonstrated Questar’s proclivity for moving the procedural goalposts to locations, angles, heights and widths of its own choosing.” The Company would like the Commission to view my respectful request as a demand, my conversion of an existing docket into a rate case for cause into initiation, and again asserts the need for some authority for a customer to ask the Commission for relief.

The Commission needs no reminder that Questar initiated this Docket, along with the Division and Clean Energy. I have merely pointed out that its complexities range across, and include several components of, at least three phases of a general rate case. Whether counsel for the parties to the stipulated permanent rate decrease have genuinely assured themselves that such a settlement would be legitimate, or have allowed their principals (sic) to persuade them to go along with it in order to claim an achievement for customers and move on to consideration of, what has been referred to in some quarters as, the decoupling proposal, while putting aside concerns about the precedential implications of such a resolution and the violation of previous Utah Supreme Court orders, is a legal question that appears to me to be a troubling one, and I respectfully encourage the Commission to enquire into it with the greatest diligence, and to consider it carefully, before determining it.[1]

[1] I lack both the legal training and qualifications, and the resources, to fully develop this argument, but the Commission, particularly its General Counsel and Administrative Law Judge, are entirely familiar with the concepts and precedents, including the Supreme Court decisions

It appears to me that it would be improper for the Commission to approve on a permanent basis a rate reduction founded on several elements, but not a comprehensive examination of all the elements, of a general rate case. I therefore respectfully recommend that the Commission disapprove the stipulation that many of the parties have been working towards at least since 18 April, and which Questar has asked the Commission to consider during the 17 May hearing in this Docket, but which they have not yet been able to finally agree.

Nowhere in my 2 February Request does the word “demand” appear. It was captioned a “Request”, I “respectfully support(ed a) request of the Committee”, and “further respectfully” made a “request” of the Commission. While it may suit Questar’s purpose to confuse the meanings of the words “request” and “demand”, I have such confidence in the ability of the Commission to distinguish them that I will not take the space to provide dictionary definitions here.

My request is not for the initiation of a general rate case; I propose such as perhaps the most appropriate framework within which the Commission might consider this request, which was initiated by these Joint Applicants.

As to authority, I agree with Questar regarding the Commission’s statutory power to initiate an investigation of the Company’s rates. Hence my request that the *Commission* convert this Docket into a general rate case. I take Questar’s pleading to be its agreement that the Commission’s statutory power extends to such a conversion. But I utterly refute the implication that neither I nor any other individual customer may ask the Commission to consider investigating a utility’s rates upon its own motion. The

reality is that the playing field is tilted dramatically against customers; the Commission should lend no credence to Questar's argument that the door is eternally closed, locked, bolted, and nailed shut against a customer plea for relief.

Questar refers to "the substantial resources required for a general rate proceeding". The utilities spend some $7, and the Division receives an appropriation of some $3 for every $1 in the Committee's budget, in part because it is charged with the regular and routine audit of the utilities. All of that money comes, ultimately, from customers, although we have no say in what the utilities, or either the Division or the Committee, choose to do with it. Where are we to find the resources to audit Questar, even if it would allow us access? Questar will not allow even the Committee access to its books and records outside an open docket, much less an individual customer, or group of customers.

We must rely upon the State's regulatory agencies, but what if we think they may be failing us? Utility monthly, quarterly, semi-annual and annual figures are concealed behind "commercial confidentiality", although they enjoy absolute monopolies in their service territories. While the Committee sees the numbers, it cannot routinely or regularly audit. All of us – Commission, Committee, customers – are entirely dependent upon the Division to alert us to possible overearning, or book-keeping or accounting problems.

If, as in this case, the Division aligns itself with a company before a docket is opened, how is the Commission to fulfill its duty to protect customers, and how is it to persuade those customers that it has done so, without ordering a full investigation?

4 THE ELEMENTS OF THE RATE REDUCTION STIPULATION ARE THEMSELVES SUFFICIENTLY COMPLEX THAT THEY SHOULD BE CONSIDERED IN A GENERAL RATE CASE

4.1 DEPRECIATION

Mr McKay testified on 23 January of Questar's assessment ($4.8M) of the appropriate reduction in the Company's depreciation expense, although its expert consultant has not yet filed testimony. Jacob Pous, the Committee's expert witness, filed testimony on 31 March, offering two approaches, establishing a range ($8M to $9.8M) up to more than twice the Company's number. Charles King, the Division's consultant, filed testimony on 27 April, with an initial recommendation significantly larger than Mr Pous's.

As joint applicants, and as parties to the stipulation, Questar and the Division no doubt will hew to the arguments that: parties are encouraged to settle in the interests of administrative efficiency, so the Commission should approve the agreement; and that settlement negations are confidential, and the details of their experts' recommendations, discussed during those meetings, should remain so. The need for the Commission to enquire into a matter sufficiently to establish substantial evidence to support its findings clearly battle with both of these planks.

Depreciation is a complex and esoteric specialty that the Commission has tended to consider first in a separate docket, implementing the results in a subsequent general rate case. Of course, this depreciation study, the first ever performed on Questar Gas, was undertaken because the Commission ordered it. The parties all agree that

customers have been paying too much for depreciation, and rates should be reduced accordingly. The question of by how much would be just and reasonable is not something that the Commission should approve in a trice.

After just a couple of hours of the experts describing their rationales on 3 May, attention rapidly turned to crafting a settlement. Never mind the careful weighing of positions, let's do a deal and get on to the next thing! The settlement that has been recommended to the Commission does not represent a considered or balanced resolution of the three experts' recommendations regarding depreciation.

4.2 PIPELINE SAFETY IMPROVEMENT ACT COSTS

It is evident from its 1 May 2006 Memorandum to all the parties in this Docket that the Commission has unanswered questions about the number happily adopted by the stipulants for accrued and future pipeline integrity costs. Questar is financially secured by an existing accounting order allowing it to defer these expenses, so there is no particular need for haste.

4.3 CAPITAL STRUCTURE

Although there is agreement between Questar and the Division, and the other stipulants have signed on to it, the Commission has very little evidence before it to support the number arising from the debt refinancing package that the Company has undertaken.

5 THE STIPULANTS HAVE APPARENTLY AGREED TO SET ASIDE ALL OF THE OTHER ELEMENTS THAT THE JOINT APPLICANTS INDICATED WERE PART OF THE RATE REDUCTION ORIGINALLY REQUESTED

These included $1.3M the Company has collected but not spent for R&D; $250,000 for LIWAP; a voluntary reduction in rate of return; and perhaps half-a-dozen or so other adjustments that have never been specified on the record in this Docket. These appear to be elements of the determination of Questar Gas Company's revenue requirement.

That the voluntary reduction in rate of return, which the Joint Applicants included in the $10.2M rate reduction they originally proposed, forms no part of the Stipulation, places the $9.7M the stipulants now recommend in context, and shows a $10.2M interim reduction to be a very reasonable suggestion.

The Joint Application requested that Schedule GSS be folded into Schedule GS-1, a rate spread issue that the stipulants have apparently also set aside.

6 THERE ARE A NUMBER OF OTHER MAJOR REVENUE REQUIREMENT COMPONENTS THAT SHOULD BE CONSIDERED IN A GENERAL RATE CASE

The plain language of UCA 54-5-1.5(4)(a) makes it clear that the several million dollars that Questar collects from its customers to pay for its own regulatory expenses and those of the Commission, Department of Commerce, Division, Committee and Attorney-General ought not to be in rates.

The assets that Questar Corporation transferred from the utility to Wexpro were developed entirely at customer risk. Wexpro returns that are guaranteed and paid for by Gas Company customers should be imputed as revenues to the utility and counted towards its rate of return.

The assets of Questar Pipeline Company have their origins in pipes that, as long ago as 1929, were built to serve and paid for solely by Utah utility consumers. Even after the assets were transferred from the utility to the Pipeline Company, substantial parts were used exclusively to serve utility customers, who continued to pay in rates fees charged by the Pipeline Company to the Gas Company for their entire cost. Over the years, Questar Pipeline has used some of those assets, that ratepayers had long paid all the costs for, to earn revenue in the inter-state transmission of natural gas, and has added investment. Those revenues must be identified and the profits imputed to Questar Gas Company. The principal follows that established in the Wexpro and Yellow Pages cases.

Questar Gas enjoys a monopoly in its service territory, and with it has an obligation to serve. When Western Public Service Corporation began service along the Wasatch Front in 1929, its system was entirely self-contained. All the natural gas it delivered to its customers came from company-owned wells and was transported along a company-owned pipeline, all paid for in rates by the customers of the vertically-integrated utility. Along the way, it has suited Questar's purposes to acquire new resources through its unregulated subsidiaries and it has neglected to grow its company-owned resources in step with its load. That load growth has come about not only because of industrial,

commercial and residential development, but also because Questar Gas has consciously undertaken the expansion of its system into previously unserved areas. As we have dramatically seen during the past winter, Questar's unregulated subsidiaries have profited hugely while Gas Company customers have suffered commensurately in the face of an extortionate market pricing regime. Had Questar arranged things as it should, its utility customers would have been protected from these high prices without harm to the Gas Company's returns.

7 THE RISK SHIFTING ASPECTS OF THE JOINT APPLICATION, INCLUDING THE TRANSFER OF RECOVERY FROM GENERAL TO PASS-THROUGH RATES, IS A RATE DESIGN ISSUE THAT SHOULD BE CONSIDERED IN A GENERAL RATE CASE

There are many issues to be debated in the second phase of this Docket, described in the 2nd Amended Scheduling Order as the "Joint Application" phase, and colloquially referred to by several parties as the "decoupling" phase. For the purposes of considering whether the Docket should be converted to a general rate case, I think it will suffice to say that Questar's purpose is to shift the risks associated with further declines in demand, exacerbated by the previously described exorbitant market prices, from the Company to customers. That has tremendous policy implications, but it also has significant rate of return ramifications that can only be addressed in a general rate case. It would be highly improper for a commission to consider such a transition without

weighing, or to approve it without reflecting the shift of risk in a modified, rate of return. And that can only be done in a general rate case.

8 IN THE CONTEXT OF A GENERAL RATE CASE, AN INTERIM DECREASE WOULD BE APPROPRIATE

This is a rather unusual matter, in that the Division is a joint applicant with Questar, and in that the Joint Applicants proposed a permanent rate decrease, notwithstanding the several other features that distinguish it from just about anything else the Commission has ever seen. In such atypical circumstances, reliance upon statute and precedent alone may not produce a reasonable outcome. The Commission has overarching powers under, for example, UCA 54-4-1 which allow it to step outside those confines should it deem it appropriate. I respectfully request that the Commission take a broad view on this occasion.

Both Questar and the Division, in their 28 April late-filed rebuttals, largely ignore the request for conversion to a general rate case in arguing that an interim decrease is inappropriate. Questar actually says, inter alia:

> Mr. Ball opposes adoption of the Pilot Program and various aspects of the rate change proposed as a package by the Application on the ground that such relief cannot be granted outside of a general rate case. However, he makes the inconsistent argument that certain portions of the Application can be granted in an abbreviated rate proceeding. He cannot have it both ways.

The Company has it inside out. I say that a general rate case is the appropriate vehicle within which to consider the decoupling proposal, in the context of a general rate case

an interim rate decrease can be contemplated, and a $10.2M interim decrease would not harm Questar because the Company was one of the Joint Applicants who first proposed a reduction of that dimension and because its interim nature pending a rate case would protect its interests.

My request is actually the conservative option presently before the Commission, in that an interim rate decrease secures the interests of both the Company and its customers, pending the full examination of a general rate case.

9 NEGOTIATIONS AND STIPULATION

According to the Division:

> all parties, including Mr. Ball, had reached agreement to suspend the filing schedule in that no disagreement was heard;

and Questar claims that:

> the parties reached a consensus agreement that it was not necessary to file legal argument in response to the March 31 filings regarding interim relief,

and

> an agreement was reached to delay the deadline for filing responses to the March 31, 2006 filings.

This is the kind of argument most usually advanced by defendants in sexual assault cases. Those who wish to argue agreement or consensus had better make sure, rather than assume, they have it.

The Division postulates:

> This disagreement is possibly significant if Mr. Ball alleges that parties have missed the opportunity to respond to requests for interim relief or to other issues.

It should not fear: unlike those who would limit input to the Commission, I am an advocate for the broadest possible range of views being advanced for its consideration. I do, however, consider that the Division should be the exemplar of good practise, and should hearken to constructive criticism of its performance.

Questar says:

> On April 20, the Committee sent a letter to the Commission memorializing that agreement and notifying the Commission that the parties had reached agreement in principle that would obviate the need for the May 17 hearing on interim rate relief,

and:

> On April 26, 2006, Mr. Ball made a filing notifying the Commission that he did not intend to agree to modify the schedule.

That's not accurate. The Committee couldn't memorialize an agreement that hadn't been reached, and my 26 April Reply said considerably more than Questar grants it. The Reply speaks for itself.

Questar rails against my position thus:

> It is ironic that Mr. Ball, purporting to be acting in the interests of residential customers, opposes a stipulated package that promotes an energy conservation Pilot Program that would encourage customers to reduce consumption (and, therefore, their gas bills) and involves a voluntary rate reduction while not foreclosing any effort to seek further rate reductions or adjustments to the Pilot Program. It is apparent that his

> efforts to seek interim or permanent rate relief divorced from the other aspects of the Application are simply an attempt to justify this irony.

Of course, even the Committee claims only to represent “a majority” of residential consumers. My intervention was to protect my own interests, “and perhaps those of other … customers”. It is in no way evident that the Stipulation – which is itself entirely divorced from the other aspects of the Joint Application – promotes energy conservation, or that any part of the Joint Application would do so given the extent of per customer consumption over the past many years.

10 SUMMARY

The Stipulation is simpler than the Joint Application, yet both are more complex than a single-item rate case, and neither allows for the comprehensive and balanced review of a general rate case. The Joint Application requires consideration of issues that usually constitute many aspects of all phases of a general rate case.

Not only has Questar, as one, supported by the Division, as another, of the Joint Applicants, requested a $10.2M permanent rate decrease based upon a “dozen or so” items, they have joined a Stipulation recommending a $9.7M permanent rate decrease based upon three items. How can they logically oppose an interim increase, with all the protections that offers, of $10.2M? That’s the same as the original offer, which had no strings attached, and only slightly more than the latest.

The Division, as party to both the Joint Application and the Stipulation, cannot be regarded as an impartial investigator in this Docket. It cannot or will not require Questar to produce all relevant information.

I respectfully reiterate my requests that the Commission convert this Docket into a general rate case, order an interim rate decrease of $10.2M backdated to 1 January 2006 when the Joint Applicants proposed one should be implemented, and direct Questar to make full disclosure to all the parties in this Docket.

Respectfully submitted on 12 May 2006,

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Roger J Ball

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Surrebuttal Argument of Roger Ball in Support of His Request for an Interim Rate Decrease in Docket 05-057-T01 was mailed electronically on 12 May 2006, to the following:

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