

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**APPLICATION TO REMOVE GSS)
AND EAC RATES FROM QUESTAR)
GAS COMPANY'S TARIFF)**

Docket No. 06-057-T04

REBUTTAL TESTIMONY OF

ELIZABETH A. WOLF

on behalf of

SALT LAKE COMMUNITY ACTION PROGRAM

FEBRUARY 2, 2007

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Q:

PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A: My name is Elizabeth A. Wolf and my business address is 764 South 200 West, Salt Lake City, Utah.

Q: ON WHOSE BEHALF ARE YOU TESTIFYING?

A: I am testifying on behalf of Salt Lake Community Action Program.

Q: ARE YOU THE SAME ELIZABETH A. WOLF WHO SUBMITTED DIRECT TESTIMONY IN THIS DOCKET?

A: Yes, I am.

Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A: I am responding to the supplemental testimony of Marlin Barrow, dated January 29, 2007.

Q: WHAT WOULD YOU LIKE TO SAY REGARDING HIS TESTIMONY?

A: I appreciate the fact that Mr. Barrow submitted testimony suggesting an alternative proposal in advance of the rebuttal date, presumably so that parties could respond to his testimony in the rebuttal phase of the case.

Q: DO YOU FAVOR HIS ALTERNATIVE PROPOSAL?

A: I think that it's an idea that merits more attention but I do have several concerns. A primary concern is that Mr. Barrow suggests utilizing a different mechanism as a way to

resolve the issue of the GSS and EAC rates going forward but there are few details available on the record. While some parties may have had discussions regarding this approach, there has not been a full airing of this proposal with all interested parties.

For this reason, we recommend that there be a technical conference scheduled so that all the parties could meet and understand how such a proposal would work. It would seem to be a departure from normal procedures to have a hearing in which the details of a new proposal have not been spelled out in more detail in advance. It makes it difficult to fully explore the ramifications of a proposal when there are as yet no details on how it would work.

Q: DO YOU HAVE OTHER CONCERNS REGARDING THE NEW PROPOSAL?

A: Yes. Another issue that is of concern regarding the proposal is the transparency, or potential lack thereof, of collecting the GSS and EAC charges from the entire GS-1 class of customers if it were done through the decoupling mechanism as suggested.

Q: WHAT HAVE YOU SUGGESTED IN PREVIOUS TESTIMONY?

A: In my Direct Testimony filed on January 16, 2007, I suggested that if the Public Service Commission (PSC or Commission) were to decide that it was appropriate to roll the GSS and EAC charges into the GS-1 rate structure, that it should do so in a way that would be separate and transparent. If the money were collected in a separate surcharge, for instance, it would facilitate accurate record keeping by the Company. In this way, it would be easy to monitor the collections and to determine when the correct amount of money was collected and avoid a situation in which GS-1 customers pay more than the required amount that is determined to be owed to the Company.

Q: WHY DOES MR. BARROW'S PROPOSAL NOT MEET YOUR SUGGESTION OF

TRANSPARENCY?

A: Adopting the proposal outlined in Mr. Barrow's testimony would ensure that rather than a transparent process, the collection of such funds would be buried in the decoupling mechanism and not be transparent at all.

Q: DO YOU HAVE ANY OTHER CONCERNS?

A: Yes. A final concern is that the decoupling mechanism is an entirely new way of calculating a portion of rates that is being tried on an experimental basis in a pilot project which is subject to analysis and evaluation by all the parties to that case. The potential addition of the reallocation of the EAC and GSS tariffed charges from those who are now paying them to a broader class of customers would complicate an already complex mechanism. The decoupling mechanism is meant to be examined and evaluated at various stages in the process. This proposal would add one more factor to separate out in the analysis that will need to be done by interested parties to determine how and if the decoupling mechanism is working as anticipated and what is in the long term best interests of all the Utah ratepayers of Questar Gas Company.

Q: DOES THAT CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes, it does.