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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of the Request of the Division of Public Utilities for Enforcement Action under the Natural Gas Pipeline Safety Act Against Questar Gas Company</p>	<p>Docket No. 07-057-04</p> <p>MOTION OF QUESTAR GAS COMPANY FOR PROTECTIVE ORDER AND REQUEST FOR EXPEDITED TREATMENT</p>
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Questar Gas Company (Questar Gas or the Company), pursuant to Utah Administrative Code R746-100-4, requests that the Commission enter a protective order in this matter on an expedited basis providing that the Appendices to the Pipeline Failure Investigation Report (Appendices), attached as Exhibit A to the Division of Public Utilities' (Division) request for agency action (Request) in this matter be treated as a confidential document and withheld from public disclosure until such time as the parties have an opportunity to specify which, if any, portions of the Appendices may be available

for public disclosure. Furthermore, Questar Gas requests that the Commission enter its standard protective order in this matter to expedite the production of documents and other information and afford necessary protection to confidential information. This motion is based upon the following:

1. The Division filed the Request on August 8, 2007, and included the Appendices as an exhibit to the Request.
2. The Appendices include highly-sensitive personal information regarding April Roper and Larry Radford who were killed in the accident that is the subject of the Request. They also include personal information of other individuals. Some of this information is exempted from public disclosure under the Freedom of Information Act, *e.g.*, 5 U.S.C. § 552(b)(6), and the Government Records Access and Management Act, *e.g.*, Utah Code Ann. §§ 63-2-302(1)(b) and (2)(d), 63-2-303.
3. Certain portions of the Appendices are marked “sealed.” Questar Gas does not object to such marking. However, it is unclear what the marking means with respect to confidential treatment.
4. It is possible that some information in the Appendices may be subject to a privilege.
5. Release of highly-sensitive and confidential information to the public prior to appropriate review and determination that the information is not privileged or is not confidential could cause irreparable injury to the Roper and Radford families and the parties to this docket and pending civil actions.
6. Temporary treatment of the Appendices as confidential is unlikely to cause injury to any person. General information regarding the accident has been

available and widely reported in the media. Parties entitled to information in the Appendices will not be precluded from receiving it, but will only be required to keep the information confidential under the terms of the protective order.

7. Entry of a protective order in this docket will expedite the production of documents and other information and afford necessary protection to confidential information.

8. The Division has already filed a motion for protective order today covering certain information in the Appendices. Questar Gas has been authorized to represent to the Commission that the Division has no objection to this motion and no objection to temporary treatment of the Appendices as confidential and withholding them from public disclosure pending further review of the issues.

9. Except for the issues relative to the Appendices, which are unique to this case, the proposed protective order attached is the template protective order recently adopted by the Commission.

Based on the foregoing, Questar Gas requests that the Commission enter an order on an expedited basis in the form attached hereto requiring that the Appendices be kept confidential until the parties have an opportunity to review them in detail to determine which portions of the Appendices contain information that is not to be disclosed publicly under FOIA, GRAMA and other applicable law, to determine if any information in the Appendices is privileged and to determine which, if any, portions of the Appendices may be available for public disclosure.

RESPECTFULLY SUBMITTED: August 9, 2007.

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Questar Gas Company

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Attorneys for Questar Gas Company

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing **MOTION OF QUESTAR
GAS COMPANY FOR PROTECTIVE ORDER AND REQUEST FOR EXPEDITED
TREATMENT** was served upon the following persons by electronic mail on August 9, 2007:

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