

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of the Consolidated Docket of Formal Complaints Against Questar Gas Company Relating to Back-Billing</p>	<p>Docket No. 08-057-11</p> <p>1st Joint Data Request to Questar Gas Company</p> <p>Committee of Consumer Services And Division of Public Utilities</p> <p>April 24, 2008</p>
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Please send an electronic copy and a paper copy of your Data Responses to:

Eric Orton – Utility Analyst
Committee of Consumer Services
Heber Wells Bldg – 2nd Flr
160 E 300 S – Box 146782
Salt Lake City UT 84114-6782

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160 E 300 S - Box 146751
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PLEASE E-MAIL YOUR DATA
RESPONSE TO:

eorton@utah.gov

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**Your Data Response is not considered received
until an electronic copy is furnished and received**

- 1.1 Please provide Company or other studies and analyses that the Company relied upon to support the decision to convert to AMR at the time the decision was made.
- 1.2 Provide a copy of all writings or records, including emails discussing or documenting the evaluation and conclusions upon which Questar Gas relies to support the allegation that automated meter reading would increase the efficiency

and accuracy of meter reading as stated in its Answer of Questar Gas Company, Background, 1. Automated Meter Reading and Transponders (page 3).

- 1.3 Please provide Company or other studies and analyses showing any changes in accuracy and efficiency improvements due to the adoption of AMR.
- 1.4 Please provide a history by month of total inaccurate billing since three years before the AMR program began to the present. Include categories for estimated and non-estimated bills.
- 1.5 Provide an update with the latest information available to the Excel charts titled 1.04A and 1.04B provided in response to DPU Data request 1.04 in what is now Docket No. 08-057-11. (At the time the data request was issued there was no docket number).
- 1.6 State all reasons known or explanations given to Questar by Elster Integrated Solutions or others for stopping production of Model 3.4 and replacing it with the VRT model.
- 1.7 Please describe in detail how transponders are set when installing them on a meter. Does the VRT transponder pre-divide internal adjustable setting allow for a range within which the pre-divide may be set without resulting in a transponder recording error? Are VRT transponder setting fixed at widely divergent settings? What are the possible settings?
- 1.8 Please describe what policies and procedures were in place to ensure the proper calibration of the transponders when they were installed.
- 1.9 Are there any other procedures now in place to ensure the proper calibration of transponders?
- 1.10 Please provide a detailed description of all training efforts by Questar Gas to train Questar Gas employees or meter installation contractors or other service personnel in the proper installation of meter transponders, the proper setting

of the pre-divide feature of the VRT transponder, and the proper testing of the transponder.

- 1.11 Please provide a copy of all writings or records provided to Questar Gas or created by Questar Gas that describe how to set the pre-divide internal adjustable setting of the VRT transponder for each type of meter upon which Questar Gas has installed the VRT transponder.
- 1.12 Please provide a copy of all writings or records provided to Questar Gas or created by Questar Gas that describe how to set the pre-divide internal adjustable setting of the VRT transponder when it is to be installed on an American 2-foot meter.
- 1.13 Please provide all written or recorded materials utilized by Questar Gas to train Questar Gas employees or meter installation contractors or other personnel in the proper installation of meter transponders, the proper setting of the pre-divide feature of the VRT transponder, and the proper testing of the transponder.
- 1.14 Please explain in detail the processes and procedures in place to prevent meter reading or recording errors.
- 1.15 Please explain in detail the processes and procedures in place to prevent incorrect billing. Describe in detail how the system was used or not used to identify errors that occurred due to the transponder errors.
- 1.16 Please state each reason or explanation, and describe each fact, circumstance, or event, that caused Questar Gas to accelerate inspections of certain meters and transponders, and that caused Questar Gas and Elster to develop a more efficient method to find and correct all incorrect pre-divide settings. In particular, identify the “certain” meters and transponders to

which Questar Gas refers in its Answer of Questar Gas Company, Current Complaints, 2. Increase in Discovery of Transponder Errors.

- 1.17 Please state the date when Questar Gas first became aware of the transponder problems in its service territory.
- 1.18 Please explain the circumstances under which Questar Gas first became aware of the transponder problems in its service territory.
- 1.19 Please provide a detailed description of the history of the transponder problem and Questar Gas' response.
- 1.20 If Questar Gas is aware of similar problems in other jurisdictions, involving Questar Gas or other gas utilities, please provide a description of the problems and jurisdictions.
- 1.21 Please state the date that Questar Gas received from Elster, the software that allowed Questar Gas to query every transponder's pre-divide setting during a reading.
- 1.22 Please state the date that Questar Gas deployed the pre-divide detection software to its meter readers.
- 1.23 Please provide all documentation in Questar Gas' possession of customer billing complaints in the GS-1 and GSS service classes where the volume of gas recorded as having been used was in dispute and for which the originally recorded customer usage was either above 150% or below 75% of the annual average usage for that customer.
- 1.24 Please provide copies of all Questar Gas' correspondence with its customers informing them of a transponder problem resulting in either a back-bill or refund. This question is asking for the letters or other

correspondence sent to individual customers with transponder problems, not for general customer correspondence.

- 1.25 Since beginning the conversion process in 1996, please provide by year the following for each year and with the greatest geographic granularity that is possible for each year:
 - a. Number of meters installed;
 - b. Cost to install;
 - c. Cost to maintain; and
 - d. Current cost to read with AMR technology compared to cost saved by not reading manually.

- 1.26 In its Answer, Current Complaints, 1. Change in Bill Adjustments, Questar refers to May 2007 telephonic and in person contact with the Division of Public Utilities. Identify each Questar employee and each Division employee engaging in these discussions and in particular, identify the “Company representative” and the “Division representative” who “agreed that the transponder error was more accurately described as a “meter reading or recording” error”. Provide all writings or other records sent or received by Questar, and all writings, notes or reports internal to Questar, that pertain to or document the agreement.

- 1.27 In a spreadsheet, please provide by account number the following information for each account identified with either an over or under reading error due to an incorrectly set transponder:
 - a. Account number; redundant?
 - b. Zip code;
 - c. Pre or post January 2008 problem (identify which ones are the 199 mentioned in the Company’s Answer);

- d. Residential or Commercial customer;
- e. On equal billing or not;
- f. Whether the customer was over or under billed;
- g. Total amount over or under billed;
- h. Total volumes over or under billed;
- i. Total volumes billed;
- j. Number of months over or under billed;
- k. Date problem was discovered;
- l. Date transponder was tested;
- m. Date the customer was notified of the problem;
- n. How customer was notified of the problem?
- o. Type of meter;
- p. Size of meter;
- q. Type of transponder;
- r. Whether the transponder was pre-installed or added-on to the meter;
- s. Whether the installation was on new construction or not (this may be the same as the previous category);
- t. Date the transponder was installed;
- u. Who installed the transponder;

- v. Vender of transponder;
- w. The volume of gas originally recorded by the company as having been used in each month for at least one year prior to installation of the transponder;
- x. The volume of gas originally recorded by the company as having been used in each month since installation of the transponder;
- y. The dollar amount originally billed for each month for at least one year prior to installation of the transponder;
- z. The dollar amount originally billed for each month since installation of the transponder;
- aa. Total amount paid or refunded;
- bb. Total amount owed; and
- cc. Number of months QGC back billed or credited.

1.28 Were transponders installed on meters in Idaho and Wyoming? Were any of the transponder problems identified in either of those two states? Describe in detail how the company is handling the transponder issues in those states. Provide a description of the rules in those states that relate to the transponder issue. Include in the spreadsheet described in question 1.27 customers in those other states.

1.29 Describe in detail the accounting used to record amounts owed for back billed gas or refunds made to customers, where the money paid was recorded. Provide this information by account number and in descriptive form so that the reader can understand how the amounts collected and owed

were recorded on the company's books and records and how those amounts affected net income.

- 1.30 Provide any internal documentation including instructions to service representatives that QGC used to back bill customers only 6 months rather than 24 months.

Dennis Miller - (801) 530-6657

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cc: Service List