Colleen Larkin Bell (5253) Jenniffer N. Byde (7947) Questar Gas Company Attorneys for Questar Gas Company 180 East 100 South P.O. Box 45360 Salt Lake City, Utah 84145-0360 Phone (801) 324-5556 Fax (801) 324-5935 colleen.bell@questar.com jenniffer.byde@questar.com

### **BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

FORMAL COMPLAINT, U.S. MAGNESIUM V. QUESTAR GAS COMPANY

#### DOCKET 08-057-20

QUESTAR GAS COMPANY'S FIRST SET OF DATA REQUESTS TO U.S. MAGNESIUM

Questar Gas Company (Questar Gas) hereby serves its first set of data requests regarding the above-docketed formal complaint of U.S. Magnesium. The responses are to be served upon and produced to Jenniffer N. Byde, Questar Gas Company, 180 East 100 South, P.O. Box 45360, Salt Lake City, Utah 84145-0360.

#### **Data Requests**

- 1.1 Please set forth in reasonable detail, by date, the cost U.S. Magnesium incurred as a result of directing deliveries into Questar Gas's system off of the Kern River pipeline between April 2, 2008 and April 11, 2008.
- 1.2 Please set forth in reasonable detail, by date, an accounting for the amount set forth in response to the previous data request identifying how such amount was calculated, how much is attributable to volumes to be delivered under the FT-2 Firm Transportation

Service Agreement dated June 30, 2006 and how much was attributable to volumes to be delivered under the Interruptible Transportation Service Agreement dated July 19, 2001.

- 1.3 Please identify the supplier referenced in your Formal Complaint, Attachment 1, who alleged that no other customers of the supplier had the same requirement. Identify with specificity the individual within the supplier's organization who made such comments.
- 1.4 With respect to the discussions referenced in the response to the immediately preceding data request, please set forth in detail the date upon which such discussion occurred, who from U.S. Magnesium participated in the discussion, and what specifically was said.
- 1.5 Please set forth in reasonable detail the basis for your statement that U.S. Magnesium was "singled out" or treated in a discriminatory manner.
- 1.6 Please provide copies of any and all documents, including but not limited to, correspondence and emails to or from any third party, relating to the issues in this docket.
- 1.7 Please provide copies of any and all documents, including but not limited to, correspondence and emails to or from any representatives of Questar Gas relating to the issues in this docket.
- Please provide recordings of any and all telephone conversations with representatives of Questar Gas regarding the subject matter of this docket.
- 1.9 Please provide any and all correspondence between U.S. Magnesium and its supplier related to sourcing volumes off of Kern River during the time period at issue in this docket, including but not limited to, information related to credits received associated with the change in delivery point.
- 1.10 Please identify the date on which U.S. Magnesium first received notice that delivery from its preferred delivery point would be unavailable or reduced between April 2, 2008 and

April 11, 2008. Please provide copies of any and all documents relating to this notice, including but not limited to, correspondence and emails.

- 1.11 Please provide copies of any and all documents, including but not limited to, correspondence and emails, recordings, notes or other details regarding actions taken by U.S. Magnesium to account for and minimize the costs associated with the requirement to receive delivery from the Kern River pipeline between April 2, 2008, and April 11, 2008, following receipt of the notice referenced in the immediately preceding data request.
- 1.12 Please describe any and all actions taken by U.S. Magnesium to account for and minimize the costs associated with the requirement to receive delivery from the Kern River Pipeline between April 2, 2008 and April 11, 2008, following receipt of the notice referenced in data request 1.10.
- 1.13 Please provide a copy of your contract(s) related to your gas supply for April of 2008.

Dated this \_\_\_\_\_ day of November, 2008.

**Respectfully Submitted** 

Colleen Larkin Bell Jenniffer N. Byde Attorneys for Questar Gas Company

# **CERTIFICATE OF MAILING**

I certify that on November \_\_\_\_\_, 2008, I sent a true and correct copy of the foregoing

# QUESTAR GAS COMPANY'S FIRST SET OF DATA REQUESTS TO U.S. MAGNESIUM

U.S. Mail, postage prepaid, to the following:

Lee R. Brown U.S. Magnesium LLC 238 North 2200 West Salt Lake City, Utah 84116-2921

Michael L. Ginsberg Patricia E. Schmid Assistant Attorneys General 160 East 300 South, 5th Floor P.O. Box 140857 Salt Lake City, UT 84114-0857

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