1. Regardless of what Senate Bill 275 authorizes, why does Questar believe that any private enterprise would be willing to risk its capital in a market where a regulated utility is allowed to participate? Why would a private firm opt to compete and invest capital in a market that allows a regulated utility to participate when a regulated utility enjoys the following: monopoly powers over its service territory; enjoys a very low cost of capital compared to private firms due to rate base; has the ability to rate base stations without bearing any risk to its own shareholders; has a robust public affairs and sales force to market its NGV fueling program; and, can harness other cross subsidies like mail stuffers in its utility bills to customers?

2. Further, if Questar is limited to $5mm/year, and assuming the competition does not come to the Utah market, it appears that Senate Bill 275 will prevent competition and stunt the natural gas vehicle fueling market's growth for Utah. Would it not be better to open this market up to fair competition by leveling the playing field? Would it not be better to infuse significantly more capital into Utah's natural gas vehicle fueling infrastructure beyond the $5 million per year approved and garner greater air quality and energy security benefits for the region? Clean Energy contends that the utility's involvement in this market is stunting the growth of the state's NGV fueling infrastructure and SB 275 limits Questar's participation to $5mm/year (less than 5 stations assuming no operation and maintenance costs).

3. How will Questar ensure that the fully allocated costs will be accounted for, including cross subsidization of services from the utilities sales force, public affairs, and even today's process? How will there be full transparency?

It should be noted that Clean Energy has chosen not to participate in the Utah compressed natural gas vehicle fueling market because, even though we are one of the largest NGV fuel providers, we will not risk our capital in a market where a utility is allowed to participate, use its monopoly powers, and invest in projects without any risk to shareholders. It is our opinion that the best way for the parent company to participate and expand the NGV fueling market in Utah is to allow its unregulated subsidiary to compete with other firms to develop the market. Such a design would create a fair and level playing field and will deliver more air quality and energy security benefits for the state of Utah than SB 275.