

1.4 Please provide, as a percentage of your total monthly usage and/or that of your customers, the type of service (i.e. firm, flexed firm, interruptible, capacity release, etc.) being used to deliver supplies to the Questar Gas city gates. Please provide the requested data each month for the 2014 calendar year.

Response: Complainants object to this data request on the grounds that: (1) It requests information that is neither relevant to the issues in this docket nor reasonably designed to lead to the discovery of relevant information. The types and mix of upstream transportation rights used by gas suppliers are not relevant to this case; (2) Complainants do not know all specific supply or transportation arrangements utilized by their upstream suppliers; and (3) the precise upstream transportation rights used by gas suppliers and marketers, and the percentages of each, are proprietary and confidential and disclosure of the same could be used by Questar to the competitive disadvantage of Complainants. Without waiving these objections, Complainants will indicate that, prior to July 1, 2014, upstream suppliers delivered supplies to city gate pools utilizing a variety of owned or available supply and transportation arrangements in an effort to maximize efficiencies and minimize costs. As a result of the Pooling Change, delivery pools are no longer recognized by QGC, reducing supply diversity and increasing costs.

CIMA further responds that gas supplies purchased by the Agents for TS customer delivery are contractually firm at the citygate, with remedies for nonperformance, and sales to TS customers are also contractually firm, with potential price adjustments for QPC allocations. The Agents leave the form of delivery to the supplier and do not keep data on gas suppliers by upstream delivery method.