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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Questar Gas Company to Make Tariff Modifications To Charge Transportation Customers for Supplier Non-Gas Services	Docket No. 14-057-31
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PREFILED REBUTTAL TESTIMONY OF JEFF J. FISHMAN

The Utah Association of Energy Users, Nucor Steel-Utah, and CIMA ENERGY LTD hereby submit the Prefiled Rebuttal Testimony of Jeff J. Fishman in this docket.

DATED this 31st day of July 2015.

HATCH, JAMES & DODGE

/s/ _____
Gary A. Dodge

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 31st day of July 2015 on the following:

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/s/ _____

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Rebuttal Testimony of

JEFF J. FISHMAN

On behalf of

Utah Association of Energy Users,

Nucor Steel-Utah, and

CIMA ENERGY LTD

Docket No. 14-057-31

July 31, 2015

1 **Q. ARE YOU THE SAME JEFF FISHMAN WHO SUBMITTED DIRECT**
2 **TESTIMONY ON BEHALF OF UAE, NUCOR STEEL-UTAH AND CIMA**
3 **ENERGY LTD IN THIS DOCKET?**

4 A. Yes, I am.

5 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

6 A. I will respond to Direct Testimony filed by Office of Consumer Services witness
7 Jerome D. Mierzwa. Specifically, I will address the misapplication of a portion of
8 my Direct Testimony filed by Mr. Mierzwa and rebut certain claims of Mr.
9 Mierzwa.

10 **Q. ON LINES 185-187 OF HIS DIRECT TESTIMONY, IN REFERRING TO A**
11 **PORTION OF YOUR DIRECT TESTIMONY, MR. MIERZWA CLAIMS**
12 **“... FISHMAN ACKNOWLEDGES ... IT IS UNLIKELY THAT**
13 **TRANSPORTATION CUSTOMERS WOULD MEANINGFULLY**
14 **REDUCE IMBALANCES...” IS HE CORRECT?**

15 A. No. This portion of Mr. Mierzwa’s Testimony addresses his response to a portion
16 of Mr. Higgins’ Direct Testimony in which he suggests that transportation
17 customers and their suppliers should be given reasonable advance notice before a
18 revenue requirement for a new daily imbalance charge should be determined. In
19 contesting Mr. Higgins’ proposal for advance notification, Mr. Mierzwa purports
20 to paraphrase a portion of my Testimony to the effect that transportation
21 customers would not meaningfully reduce their imbalances. That was not my
22 Testimony. Rather, my Testimony addressed the problem that Questar’s proposal

23 does not provide the tools needed to meet the objective of “better nomination
24 practices.” The partial excerpt from my Testimony included in Mr. Mierzwa’s
25 response mischaracterizes my Testimony, which is that timely receipt of data is
26 needed to refine the nomination process to mitigate imbalances, and that such data
27 is not currently provided by QGC.

28 **Q. WAS YOUR POINT MADE CLEAR IN YOUR DIRECT TESTIMONY?**

29 A. I believe so. In fact, the point related to the lack of data was reinforced in lines
30 70-74 of my Testimony: “The natural gas metering and information systems
31 operated by QGC do not provide the transportation customers with timely data
32 that would permit them to adjust nominations and mitigate daily imbalances.
33 Transportation customers and suppliers cannot be expected to operate within a
34 5% daily tolerance without meaningful real-time data.”

35 **Q. DID MR. MIERZWA ADDRESS THE ISSUE OF TIMELY RECEIPT OF**
36 **DATA?**

37 A. Somewhat. In lines 212-214, he states “...transportation customers should be
38 responsible for monitoring their own usage on a real-time basis and for paying the
39 costs associated with any necessary telemetering services.”

40 **Q. CAN YOU COMMENT ON THIS ASSERTION?**

41 A. Yes. My issue with Mr. Mierzwa’s statement, and with the circumstances faced
42 by transportation customers in light of QGC’s proposal, is that they are in fact
43 paying for telemetering of data to QGC, but the current nomination process and
44 data feedback system operated by QGC do not give transportation customers

45 timely information to mitigate daily imbalances or the proposed restrictions and
46 charges that QGC proposes to place on transportation customers in this Docket.
47 Current practices and processes should be adjusted so that transportation
48 customers and their suppliers can receive meaningful usage data on a timely basis
49 so that nomination accuracy can be improved.

50 **Q. WHAT TELEMETERING SERVICES DO THE TRANSPORTATION**
51 **CUSTOMERS ALREADY PAY FOR?**

52 A. Questar Gas Company Utah Natural Gas Tariff, Section 5.01 Conditions of
53 (Transportation) Service includes the following requirements: “The Company will
54 require telemetering equipment as a prerequisite to providing transportation
55 service. Any customer facilities required to facilitate telemetry, which may
56 include power, phone lines or other, required by Questar Gas must be installed by
57 customer and operational by May 15 of any given year.”

58 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

59 A. Yes.