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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 The Office of Consumer Services' Post Hearing Brief
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The Office of Consumer Services (“Office”) hereby respectfully submits its Post Hearing Brief in the above entitled matter.

The Office supports the Questar Gas Company (“Company”) request that Transportation Gas (“TS”) customers pay their share of daily transportation balancing services, a service they utilize but for which but do not currently pay. At the present time these charges are being fully borne by the Company’s sales customers. Until this inequity is rectified the sales customers will be unfairly burdened by inappropriate cost shifting.

The Company provided adequate and reasonable documentation to support its request for a charge of \$0.19064 per Dth on daily imbalances that exceed five percent (5%) of usage. The Office believes this approach is appropriate to cover

the costs imposed by TS customers and will also assist in meeting the Company's stated intention to incent more accurate nominations by customers. Such a price signal is the most direct way to implement those incentives and is fair because accurate nominations will result in lower charges to TS customers.

An alternative volumetric charge has been proposed as well. A charge of \$0.03675 per Dth on transportation volumes would also be fair and help ameliorate the cost shifting to sales customers.

Some participants support the creation of another task force to determine whether and how such a charge should be calculated and imposed. The Office opposes this approach and believes it would not be a good use of resources. The evidence shows that the parties have already met and discussed the issues extensively as is demonstrated by the testimony in this hearing. It seems unlikely that further discussions will do little more than delay the imposition of the necessary charges. The Office believes the current record is sufficient for the Commission to make a decision in this matter.

There is no "perfect" solution that will satisfy all affected parties but the proposals presented by the Company provide a reasonable balance of competing interests and needs. The two proposals supported by the Office are appropriately designed to address the inequities in the current allocation of balancing costs between sales customers and transportation customers.

Dated the 23rd day of September, 2015

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Utah Office of Consumer Services