Colleen Larkin Bell (5253)
Jenniffer Nelson Clark (7947)
Questar Gas Company
333 South State Street
P.O. Box 45433
Salt Lake City, Utah 84145-0433
(801) 324-5392
(801) 324-5935 (fax)
Colleen.Bell@questar.com
Jenniffer.Clark@questar.com

Attorneys for Questar Gas Company

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 USE OF SUPPLIER-NON-GAS SERVICES	Docket No. 14-057-31 QUESTAR GAS COMPANY'S POST-HEARING BRIEF

On August 26, 2015, the Utah Public Service Commission (Commission) held a hearing in this docket. At the conclusion of the hearing, the Commission indicated that it would accept post-hearing briefs. (Hearing Transcript, Docket No. 14-057-31 (Hearing Trans.), Page 240, Lines 19-22). Accordingly, Questar Gas Company (Questar Gas or Company) respectfully submits this post-hearing brief.

I. Introduction.

Questar Gas has proposed the implementation of an imbalance charge for customers in the TS, FT-1, and MT rate classes (collectively Transportation Customers). If approved, the proposed charge will achieve two objectives: (1) to properly allocate costs of transportation, no-notice transportation (NNT) and storage services incurred by Questar Gas on the upstream pipelines (collectively, the SNG Services) to the Transportation Customers when they use those services, and (2) to incent the Transportation Customers and their Agents[1] to properly nominate volumes such that daily nominations accurately estimate each Transportation Customers' expected daily usage. As more fully set forth herein, the Company has plainly met its burden to provide substantial evidence that the proposed charge is just and reasonable. The Interveners[2], on the other hand, have failed to advance any alternative rate design proposal that would achieve both articulated goals and, in the case of Interveners' aggregation proposal espoused by Mr. Dodge at the hearing, have failed to offer any evidence at all showing how such a proposal could be implemented.

II. Transportation Customers Should Pay for the Services They Use.

Transportation Customers utilize the SNG Services each day. (Direct Testimony of Kelly B. Mendenhall (Mendenhall Dir.), Lines 27-53). It is undisputed that the Transportation Customers and their Agents do not attempt to match individual customers' daily nominations to their expected daily usage. (Mendenhall Dir., Exhibit 1.3; Direct Testimony of Matthew Medura, Lines 103-105; Direct Testimony of Roger J. Swenson (Swenson Dir.), Lines 22-23; Rebuttal Testimony of William F. Schwarzenbach (Schwarzenbach Reb.), Lines 70-130; Exhibit 2.2R). In fact, Exhibit 1.3 shows that Transportation Customers are out-of-balance 96% of the time, and that Transportation

[1] The term "Agents" means agents that Transportation Customers have retained to manage their gas supply. For example, interveners CIMA Energy, LTD., Summit Energy, LLC, and Continuum Retail Energy Services, LLC are "Agents" who manage supply for a number of Questar Gas' Transportation Customers.

[2] The term "Interveners" means those who have intervened in this matter including Summit Energy, LLC, Nucor Steel – Utah, a Division of Nucor Corporation, the Utah Association of Energy Users, CIMA Energy Ltd., US Magnesium LLC, Summit Energy LLC, and Continuum Retail Energy Services LLC. "Interveners" does not refer to the Office of Consumer Services (Office) or the Utah Division of Public Utilities (Division).

Customers are out-of-balance by more than the proposed 5% tolerance 82% of the time. (Mendenhall Dir., Lines 44-53) Under the existing provisions of the Company's Utah Natural Gas Tariff No. 400 (Tariff), there is simply no incentive for the Transportation Customers or their Agents to nominate accurately on a daily basis. (Swenson Dir., Lines 31-33; Direct Testimony of Jeff J. Fishman (Fishman Dir.), Lines 151-154; Direct Testimony of Jerome D. Mierzwa (Mierzwa Dir.), Lines 186-187).

When a Transportation Customer's usage does not match its nomination for the day, the Company accommodates the differences. If a Transportation Customer delivers more or less volumes than it uses, the Company must adjust its storage volumes daily. The Company uses the NNT Service and accompanying upstream transportation contracts it has with Questar Pipeline Company (QPC) in order to make these imbalance adjustments.

For purposes of measurement and daily balancing, QPC considers those volumes nominated by Transportation Customers to be the "first through the meter." (Hearing Trans., P. 84, Line 17- P. 85, Line 23). Every dekatherm (Dth) nominated by a Transportation Customer is considered delivered to Questar Gas' system first, and any volumes nominated by Questar Gas will then follow. As a result, the actual delivery amounts for the Transportation Customers on QPC always match the nomination. (Hearing Trans., Page 84, Line 17- Page 85, Line 23). QPC attributes any imbalance between actual deliveries and nominations, including Transportation Customer imbalances, to Questar Gas and Questar Gas is then left to address the entire imbalance with QPC. *Id.* Questar Gas does so utilizing the SNG Services. Questar Gas' sales customers pay all of the costs associated with SNG Services but, when they are available, Questar Gas uses the SNG Services to ensure that

Transportation Customers who are out-of-balance on a given day are able to utilize the volume of natural gas they require.

At the hearing on this matter, counsel for some of the Interveners posed a hypothetical under which the Transportation Customers purchased SNG Services directly from QPC, argued that QPC theoretically offers a 5% tolerance, and suggested that Transportation Customers should be given the benefit of the hypothetical 5% tolerance. The hypothetical has no basis in reality because Questar Gas has, from QPC's perspective, made the Transportation Customers whole—regardless of whether or not their nominations match their usage. If QPC did offer any tolerance, it would be applied to Questar Gas because, Questar Gas must address the imbalance problem with QPC, not the Transportation Customers. Creating a rate design based on the hypothetical benefit of an upstream pipeline tolerance would result in Transportation Customers not paying for the costs they incur on the system and would ensure that sales customers would continue to further subsidize services that are used by Transportation Customers.

The SNG Services function somewhat like a bus pass. (Hearing Trans., Page 57, Lines 4 to 15). Questar Gas' sales customers have purchased the services of a bus (SNG Services) and utilize it as needed. *Id.* On days when the sales customers do not fill the seats on the bus, the seats are then available to Transportation Customers. *Id.* Transportation Customers then may choose to either (a) utilize the SNG Services (essentially, getting on the bus for a day) or; (b) nominate a daily amount that closely matches the customer's actual usage (effectively choosing not to get on the bus and use the SNG Services and instead more closely manage nominations). *Id.* Each Transportation Customer can choose, each day, whether or not to utilize the SNG Services. As Questar Gas Exhibits 1.3 and 2.2R plainly show, the Transportation Customers have overwhelmingly opted to ride the bus (or use the SNG Services) nearly every day.

Questar Gas proposes charging the Transportation Customers for the SNG Services *only when they utilize them*, on days when they choose to ride the bus. The Company is, in effect, offering each Transportation Customer a choice: (1) manage your nomination within a 5% tolerance and pay nothing for the SNG Services, or (2) pay for the SNG Services you utilize outside the 5% tolerance. Each Transportation Customer may choose which option better suits its business needs on any given day. Those customers who use 20 Dth in a day can pay $0.19 per Dth for the SNG services they use, rather than undertaking the obligation of more-closely monitoring their nominations and usage. (Surrebuttal Testimony of Kelly B Mendenhall (Mendenhall Sur.), Lines 171-183). For a 20-Dth-per-day customer who is typically 10% out of balance, this would result in approximately $6.00 per month for SNG Services. *Id.* A larger customer, on the other hand, may find it more economically beneficial to more closely manage its nominations. In either case, the given customer will bear the costs it incurs on the system. The Transportation Customers will never pay for services they do not use.

The evidence clearly shows that the Transportation Customers avail themselves of the SNG Services. They should pay for the services they use.

<u>III. The Proposed Rate is Calculated Properly.</u>

The Company's proposed rate reflects both the value that the Transportation Customers receive and the costs sales customers incur for the SNG Services. The Company has proposed the following formula for the rate:

$$\frac{\text{(1) Volumetric rates for services used X (2) total net imbalance volumes}}{\text{(3) the Daily volumes outside of 5\% tolerance}}$$

(Mendenhall Dir., Lines 66-74).

The Volumetric rates (Component 1) are drawn from the actual costs associated with making individual SNG Services available (Mendenhall Dir., Lines 77-85).

Some Interveners suggest the Company should calculate the rate on out-of-balance volumes only *after* the Transportation Customers' volumes, collectively, are netted against Questar Gas' sales customers. The Interveners overlook the fact that Questar Gas pays to make the SNG Services available, and that the Interveners' approach is inconsistent with how QPC charges for the SNG Services.

"Interstate pipelines do not waive storage injection and withdrawal charges for those customers whose injection or withdrawal activity is in the opposite direction of the activity of the majority of their customers." (Mierzwa Dir., Lines 129-132). Pipelines charge each customer for their use of the service, whether or not any physical movement of gas occurs. Questar Gas applies the same methodology here—Questar Gas remedies any Transportation Customers' over or under-delivery, regardless of whether an actual, physical movement of gas occurs.

Moreover, the Company only asks the Transportation Customers to reimburse the sales customers for the cost of the SNG Services on days that the Transportation Customers, as a group, collectively use them. The total net imbalance volumes (Component 2) include netting of *all Transportation Customers*' daily usage such that if one customer over-delivers 100 Dth and another under-delivers 100 Dth, the second component will reflect zero Dth out of balance. The Company proposes to calculate a rate *only on those imbalance volumes* *remaining after all Transportation Customers' imbalances have been netted against one-another.* Any further netting would simply ensure that the Transportation Customers, both individually and as a whole, never bear the costs associated with the SNG Services they use.

Mr. Swenson erroneously speculates that Questar Gas should not charge for daily imbalances that could be absorbed by line pack. (Swenson Dir., Lines 115-118). Mr. Swenson's speculation that line pack exists is without foundation. He does not claim to have studied the line pack *actually* available on Questar Gas' system and the Commission should therefore afford little, if any, weight to his testimony relating to line pack. Utah Admin. Code R. 746-100-10 (F)(1) ("no finding may be predicated solely on hearsay or otherwise incompetent evidence"). William Schwarzenbach, on the other hand, has used his expertise and knowledge about Questar Gas' system to address issues of line pack[3] and he testified that Questar Gas' system does not have enough line pack to absorb the Transportation Customers' over and under deliveries. (Schwarzenbach Reb., Lines 217-236). Moreover, from an accounting perspective, Questar Gas does not include "line pack" in its rate base. (Rebuttal Testimony of Kelly B Mendenhall, (Mendenhall Reb.), Lines 274-280). The credible testimony in this docket suggests that there is no line pack to absorb Transportation Customer's daily imbalances and that it should not be part of the charge calculation.

Once the per-Dth rate has been calculated in the numerator of the formula (Components 1 and 2), the rate will be applied to each out-of-balance Dth outside of a 5% tolerance band (Component 3). Though the Transportation Customers utilize the SNG Services for *every* out-of-balance Dth, the Company only proposes to charge for usage outside this 5% tolerance.

---

[3] Mr. Schwarzenbach previously served as Questar Gas' Lead Operations Engineer responsible for system planning and analysis focusing on peak-day planning of the Questar

Some have suggested that a 5% tolerance is too narrow. Questar Gas' Tariff already contains a 5% daily balancing requirement, though it lacks any enforcement mechanism. (Tariff, Section 5.09). Additionally, some of the Interveners themselves proposed the 5% tolerance during a Commission-ordered work-group meeting. (Mendenhall Dir., Lines 126 to 168; Hearing Trans., P. 62, Line 9 – P. 63, Line 2). One witness for the interveners confirmed that a 5% accuracy-level was typical saying, "CIMA's customers can and do provide us with a daily nomination that is within 5% of their actual usage." (Rebuttal Testimony of Matthew Medura, Lines 26-27). Plainly this is a reasonable tolerance band.

Some Interveners suggest that, in addition to the netting that occurs in Component 2, the Transportation Customers should get an additional benefit by requiring additional netting in Component 3. Interveners suggest that the Commission should require that Transportation Customers' volumes should be netted together in the Component 3 calculation, and/or that the Transportation Customers' volumes should be netted against all of the sales service customers' volumes in this third component. Charging the Transportation Customers for each out-of-balance Dth more accurately reflects the benefit that customer receives and sends a price signal to each Transportation Customer. Additionally, the Company has already netted the imbalances of the Transportation Customers together in the calculation of the rate (Component 2). Netting a second time during the assessment of the rate would result in double counting and Transportation Customers would never pay for the services they use.

The proposed charge reflects both the cost and the value of the SNG Services. (Mierzwa Dir., Lines 113-117; Hearing Trans., Page 34, Lines 7-14 and Page 35, Lines 12-17) the proposed change is just, reasonable and in the public interest.

Gas system. (Exhibit 2.1R).

IV. The Transportation Customers' Failure to Properly Nominate Creates Operational Problems on the Company's System.

When the Transportation Customers fail to accurately nominate on a daily basis, the Company can experience extraordinary difficulty. The Division accurately points out that Transportation Customer usage represents 25% of the total annual volume on the Questar Gas System and, during warm summer months, greatly exceeds the usage of sales service classes. (Direct Testimony of Douglas D. Wheelwright (Wheelwright Dir.), Lines 85-108, Surrebuttal Testimony of Douglas D. Wheelwright (Wheelwright Sur.), Lines 22-23). When Transportation Customers fail to nominate on a daily basis, and make no attempt to match nominations to anticipated usage, the Company has great difficulty planning its own deliveries to the system. The Company never knows whether the Transportation Customers are collectively, or individually, going to over or under deliver. Transportation Customer over-deliveries can limit Questar Gas' ability to inject volumes into storage during summer months, and may even result in the need to shut-in production. (Wheelwright Dir., Lines 69 - 82).

In winter months, the Company more heavily utilizes the SNG Services on behalf of the sales customers and has limited SNG Services to offer to Transportation Customers. (Schwarzenbach Reb., Lines 38-47). In the case of supply curtailments, the Company must contact each affected Transportation Customer and direct it to limit usage to its nomination. *Id.* If the nomination made on behalf of an affected Transportation Customer is not accurate, the customer may be restricted to a point that it does not have enough gas to meet its needs. (Schwarzenbach Reb., Lines 52-59). Historically, Transportation Customers in this situation have simply refused to restrict their usage to their nomination. *Id.* If enough Transportation

Customers followed this practice, it could result in an interruption of service to firm sales customers. *Id.*

V. The Proposed Charge Will Incent Proper Nominating Practices.

The Parties seem to agree that charging Transportation Customers for the daily use of SNG Services will result in better, more accurate daily nominations. (Swenson Dir., Lines 48-49).

Curiously, some Interveners argue that requiring daily nominations, or greater accuracy in nominations, is burdensome. Although the Transportation Customers and their Agents have generally made no attempt to nominate accurately on a daily basis, these customers and their Agents have always had the responsibility to do so. (Schwarzenbach Reb., 140-144; Tariff, Section 5.09). Indeed, daily nominating is an industry standard. If this obligation is disruptive to the Transportation Customers and their Agents, it is only because they have consistently ignored existing obligations. (Schwarzenbach Reb., Lines 140-154). The Interveners' testimony is simply further evidence that the proposed charge will, indeed, aid in incenting these customers and their Agents to properly nominate on a daily basis. *Id.*

While there may be other means of reimbursing the sales customers for the SNG Services that the Transportation Customers use, none would incent Transportation Customers and their Agents to improve their nominating practices. The Division and others have proposed a per-Dth volumetric charge on every Dth of transportation service (sometimes referred to as a socialized charge). While a socialized charge would address the intra-class subsidy, and would result in Transportation Customers paying for services, it would not incent an improvement of nominating practices. (Schwarzenbach Reb., Lines 262-270; Wheelwright Sur., Lines 155-157). In fact, "nomination accuracy would get worse" because "there would be no reason for a customer to try to do better, since all volumes will be forced to pay the same charge regardless of a given customer's nomination accuracy." (Rebuttal Testimony of Roger J. Swenson, Lines 23-30).

Similarly, there has been some suggestion that Transportation Customers should be permitted to choose between a socialized charge and a charge only on those dekatherms outside a 5% tolerance. Again, those who choose the socialized charge would not experience any incentive to improve nominating practices at all. There is no need for such a rate structure because each customer already has a choice under the Company's proposal: each customer can choose to manage nominations within 5% and pay nothing or it can continue its current nomination practice and pay for the SNG Services it uses. (Mendenhall Sur., Lines 158-170).

VI. Ancillary Issues.

a. Working Group.

A working group would only prolong and delay the implementation of a much-needed Commission Order. The Company, the Office, the Division and many of the Interveners have been working on this and related issues for more than two years. (Wheelwright Dir., Lines 57-62; Mierzwa Dir., Lines 97-102; Mendenhall Reb., Lines 121-125; Rebuttal Testimony of Gavin Mangleson (Mangleson Reb.), Lines 37-63). Though the Parties agree that Transportation Customers are not bearing any costs associated with SNG Services and that they do not nominate on a daily basis or strive for daily accuracy in nominations, the stakeholders are at an impasse as to what (if anything) those customers should pay for daily imbalance services. Further discussion is unlikely to overcome this impasse. (Mendenhall Reb., Lines 126-168; Mangleson Reb., Lines 29-36; Mendenhall Sur., Lines 38-50). The Company has confidence in the regulatory process as an effective and efficient means of resolving disputes like this one. The parties in this docket have spent more time conducting discovery and submitting testimony than is typically allowed in a general rate case. These nomination issues have spanned multiple years and multiple dockets. Continued working group activities would result in delay, repetition of the very process the parties and the Commission have nearly completed, and further months of subsidy to the Transportation Customers.

b. Aggregation.

As a preliminary matter, there is very little evidence on the record to support allowing aggregation of volumes at the Agent level. Though some interveners have suggested that Agents should be permitted to aggregate all of their customers' volumes and net them against one another before being assessed any charge, none have offered any evidence at all to suggest (a) how the rate would be calculated in such a scenario, (b) how the Company would bill the charge to customers when the nominations individually are inaccurate, or (c) how the Company would enforce curtailments or usage restrictions amongst each Agent's group of customers. Indeed, "While the issue of aggregation has been briefly raised in this case, there is no proposal before the Commission that clearly explains how the rate will be calculated or assessed." (Hearing Trans., page 22, Line 15 – Page 23, Line 2). The interveners advancing this proposal have the burden of proving that the proposal is just, reasonable and in the public interest.[4] Without further evidence detailing how aggregation could be implemented, they have failed to meet this burden.

---

[4] Re Mountain Fuel Supply Company, 1993 WL 501430, P. 17 (Utah P.S.C. 1993) ("We recognize that a public utility has the burden to justify the rate relief that it seeks. However, here the 'rate relief' Mountain Fuel sought was approval of rate reductions . . . It is the Committee that is claiming that these rate reductions should be substantially larger. In these circumstances, the Committee has the burden of establishing a reasonable basis

Additionally, allowing aggregation of volumes at the class or Agent level would undermine both of the Company's articulated goals in this proposal. Aggregation would ensure that the Transportation Customers never pay for the SNG Services they use. (Mendenhall Reb., Lines 363-366, Mendenhall Sur., Lines 102-134) Aggregation would also create a circumstance where each Agent could adjust a group nomination for all of its Transportation Customers and never nominate accurately on a daily basis for any given customer. (Mendenhall Reb., Lines 367-372). If the Commission adopted this approach, the operational difficulties associated with the poor nominating practice would persist. (Schwarzenbach Reb., Lines 239-251, Surrebuttal Testimony of William F. Schwarzenbach, Lines 45-59; Wheelwright Sur., Lines 170-171).

c. More Frequent Use of Tariff-Based Restrictions.

The Division suggests that the Company could resolve the issues articulated in the Application by imposing imbalance restrictions (some refer to these restrictions as "operational flow orders" or "OFOs") more frequently. However, the imbalance restriction language in Section 5.09 of the Tariff is not, itself, sufficient to address the imbalance problems. The current Tariff language allows Transportation Customers to trade imbalances, and Agents to aggregate imbalances. As described above, allowing aggregation and trading will not incent better nominating practices and the operational problems associated with poor nominating practices would persist. (Schwarzenbach Reb., Lines 271-282). If the aggregation language were removed from the Tariff, then more frequent use of restrictions could help solve the operational problems. (Schwarzenbach Reb., Lines 283-303).

---

upon which we could conclude that Mountain Fuel acted imprudently.")(Internal citations omitted).

d. Access to Data.

Transportation service is an elective service and Transportation Customers should be responsible to monitor their own usage. (Mierzwa Dir., Lines 212-214). If the Transportation Customers and their Agents utilized the information currently available, and made an attempt to adjust nominations each day, they would dramatically reduce individual customer daily imbalances on the system. Industrial customers know how much gas their processes require and when they are starting and stopping processing. (Hearing Trans., page 23, Lines 14-22). Agents have access to this same information (via communication with customers) and also have access to a wide range of technical data including "proprietary forecasting regression models, local weather forecasts, historical consumption profiles and current Usage Trending". (Direct Testimony of Michael R. McGarvey, Lines 119-120). Yet the evidence shows that neither the Transportation Customers nor their Agents are utilizing this data or making any effort to nominate accurately on a daily basis. (Mendenhall Dir., Exhibit 1.3).

Additionally, each customer has a meter on site that provides real-time data. An employee walking outside to check the meter could provide accurate usage information any time a customer wants to see it. For many of the Transportation Customers, this is the method of monitoring usage during restriction events in the past. If a customer wanted additional real-time data, that customer could do what other Transportation Customers have already done—purchase equipment to provide that data. Plainly, the Transportation Customers and their Agents currently have access to sufficient data to dramatically improve the accuracy of their daily nominations.

VII. Conclusion

Substantial evidence supports the approval of Questar Gas' Application and shows that the proposed charge is just, reasonable and in the public interest. Therefore, the Company respectfully requests that the Commission approve Questar Gas' proposal in this docket.

RESPECTFULLY SUBMITTED this 23rd day of September, 2015.

QUESTAR GAS COMPANY

____

Colleen Larkin Bell
Jenniffer Nelson Clark
Questar Gas Company

Attorneys for Questar Gas Company

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the Questar Gas Company's Post-Hearing Brief was served upon the following persons by e-mail on September 23, 2015:

Patricia E. Schmid
Assistant Attorney General
160 East 300 South
P.O. Box 140857
Salt Lake City, UT 84114-0857
pschmid@utah.gov

Michele Beck
Utah Office of Consumer Services
160 East 300 South, Suite 200
PO Box 146782
Salt Lake City, UT 84114-6782
mbeck@utah.gov

Rex Olsen
Assistant Attorney General
160 East 300 South, Suite 200
P.O. Box 146782
Salt Lake City, Utah 84114-6782
rolsen@utah.gov

Chris Parker, Director
Division of Public Utilities
Heber Wells Building 4th Floor
160 East 300 South
Salt Lake City, Utah 84111
chrisparker@utah.gov

Justin Jetter
Assistant Attorney General
160 East 300 South
P.O. Box 140857
Salt Lake City, Utah 84114-0857
Jjetter@utah.gov

Larry R. Williams, Counsel
Summit Energy, LLC
10447 South Jordan Gateway
South Jordan, Utah 84095
larry@thesummitcompanies.com

Damon E. Xenopoulos
BRICKFIELD, BURCHETTE, RITTS & STONE, P.C.
1025 Thomas Jefferson Street, N.W.
800 West Tower
Washington, D.C. 20007
dex@bbrslaw.com

Jeremy R. Cook
PARSONS KINGHORN HARRIS, P.C.
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
jrc@pkhlawyers.com

Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEIIM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
kboehm(bkllawfinn.com
jkylercohn@BKLlawfirm.com

Brian W. Burnett
Callister Nebeker & McCullough
Zions Bank Building
10 East South Temple, Suite 900
Salt Lake City, UT 84133
brianburnett@cnmlaw.com

Gary A. Dodge
HATCH, JAMES & DODGE
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
gdodge@hjdlaw.com

Kevin Higgins
Neal Townsend
ENERGY STRATEGIES
215 S. State Street, #200
Salt Lake City, UT 84111
khiggins@energystrat.com
ntownsend@energystrat.com

Matt Medura
CIMA ENERGY LTD
299 South Main Street, Suite 1300
Salt Lake City, UT 84111
mjm@cima-energy.com

Roger Swenson
E-Quant Consulting LLC
1592 East 3350 South
Salt Lake City, UT
roger.swenson@prodigy.net

James Morin
Director C&I West Region
Continuum Retail Energy Services LLC
jmorin@ContinuumES.com