

Jenniffer Nelson Clark (Bar No. 07947)
333 S. State Street
P.O. Box 45360
Salt Lake City, Utah 84145-0360
Phone (801) 324-5392
Fax (801) 324-5935

Attorney for Questar Gas Company

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE FORMAL)	DOCKET NO. 15-057-15
COMPLAINT OF DELL ELLERTSON)	QUESTAR GAS COMPANY'S
AND LUCEAL ELLERTSON AGAINST)	ANSWER AND MOTION
QUESTAR GAS COMPANY)	TO DISMISS
)	

ANSWER

Respondent Questar Gas Company (Questar Gas or Company) respectfully answers the Formal Complaint of Dell Ellertson and Luceal Ellertson (“Mr. Ellertson,” “Ms. Ellertson” and jointly as “Complainants”) as follows:

INTRODUCTION AND BACKGROUND

1. On April 29, 2014, a man identifying himself as Luceal Ellertson, called Questar Gas seeking information on the account for the property commonly known as 280 E. Southgate Avenue, So. Salt Lake City, Utah (“Residence”).
2. The man identifying himself as Luceal Ellertson was not able to accurately identify specific account holder information such as the account holder’s date of birth.
3. The same man called again on May 8, 2014, and was still not able to verify the date of birth on the account. Questar Gas requested that he send in identification so that the correct date of birth could be verified and the account could be updated with the correct information. He declined to do so.

4. Questar Gas's Fraud Department investigated the matter. The investigation revealed that Dell Ellertson was an occupant of the Residence.

5. According to Company records, Mr. Ellertson was added to the account on May 9, 2014.

6. The account was delinquent when Mr. Ellertson was added to the account. On May 15, 2014, June 14, 2014, July 17, 2014, September 18, 2014, and January 14, 2015, Questar Gas mailed Urgent Notices informing Mr. Ellertson that the account was delinquent.

7. On February 19, 2015, Questar Gas sent another Urgent Notice to Mr. Ellertson at the Residence. *See* Informal Complaint, page 2.

8. On March 12, 2015, a Final Notice was posted at the Residence. A copy of the final notice was attached to Mr. Ellertson's Formal Complaint.

9. On March 16, 2015, Mr. Ellertson made a partial payment.

10. On March 23, 2015, natural gas service was terminated at the Residence for non-payment in accordance with the Questar Gas Company Utah Natural Gas Tariff PSCU ("Tariff") Section 9.08.

11. On April 15, 2015, Questar Gas was completing a route read and discovered that the meter had been turned on in violation of PSC Rule 746-200-7(C)(1)(d) and Section 7.02 of the Company's Tariff.

12. On or about April 20, 2015, Questar Gas plugged the natural gas meter at the Residence in accordance with Section 7.02 of the Tariff.

13. On July 2, 2015, the past due account for natural gas service at the Residence was turned over to collections.

14. Upon notice of this Complaint, Questar Gas ceased the collections process, and on October 15, 2015, Mr. Ellertson gave oral permission to place the account in his name to have

natural gas service restored at the Residence. *See* Exhibit “B” attached hereto. On October 19, 2015, the Company placed the account in Mr. Ellertson’s name and restored service. *See* Exhibit “C” attached hereto.

15. Questar Gas believes this resolves the complaint.

MOTION TO DISMISS

Questar Gas has taken steps to fully resolve this matter and there is no further relief available to Mr. Ellertson. Questar Gas therefore moves for the dismissal of the Complaint.

WHEREFORE, Questar Gas Company submits its Answer and respectfully moves that the Formal Complaint of Dell Ellertson be dismissed.

Dated this 13th day of November 2015.

Respectfully Submitted



Jenniffer Nelson Clark
Attorney for Questar Gas Company
333 S. State Street
P.O. Box 45360
Salt Lake City, Utah 84145-0360
Phone (801) 324-5392
Fax (801) 324-5935

CERTIFICATE OF MAILING

I certify that I mailed a true and correct copy of the foregoing Answer and Motion to

Dismiss on November 13, 2015, to:

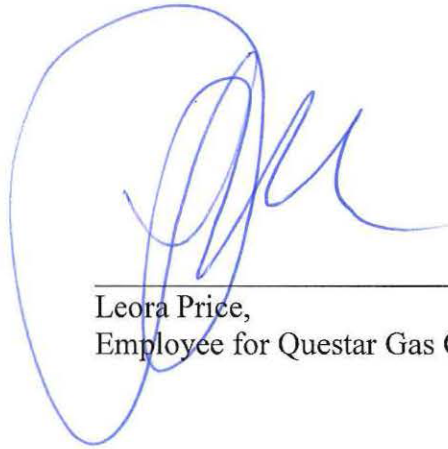
Hand-Delivery:

Claimant:

Dell K. Ellertson
Lucael Ellertson
280 E. Southgate
So. Salt Lake City, Utah 84115

Division of Public Utilities
160 East 300 South, 4th Fl
Salt Lake City, UT 84111

Office of Consumer Services
160 East 300 South, 2nd Fl
Salt Lake City, UT 84111

A handwritten signature in blue ink, appearing to be 'Leora Price', is written over a horizontal line. The signature is stylized and somewhat cursive.

Leora Price,
Employee for Questar Gas Company

EXHIBIT "A"



Questar Gas Company
 1140 West 200 South
 P.O. Box 45360
 Salt Lake City, UT 84145-0360
 Tel (801) 324-5111 or (800) 323-5517

05/15/2014

URGENT NOTICE (AVISO URGENTE)

Account [REDACTED]

Dear Dell Ellertson:

One or more addresses associated with the above account has a past-due balance. If you do not pay the past-due amount of [REDACTED] or make credit arrangements **within 10 days** of the date on this notice, natural gas service may be terminated. If arrangements are made and not honored, service may be terminated without additional notice.

If the total past-due amount has been paid, please disregard this notice.

For customer security and employee safety, Questar Gas does not accept natural gas service payments at customers' premises. If you have any questions, please contact us at 801-324-5111 or 1 800-323-5517, Monday through Friday, 7 a.m. to 6 p.m., or visit our website at www.questargas.com.

Si necesita ayuda en Español, por favor llame a Questar Gas al número 801-324-5111 ó al 1 800-323-5517.

Sincerely,
 Questar Gas

10DAYTERM

Please write your account number on your check and return this portion with your payment.



Account	Total Amount Due	Amount Enclosed
[REDACTED]	[REDACTED]	

Questar Gas Company
 PO Box 45841
 Salt Lake City, UT 84139-0001

#BWNJVBK
 Dell Ellertson
 280 E Southgate Ave
 South Salt Lake UT 84115-3616





Questar Gas Company
 1140 West 200 South
 P.O. Box 45360
 Salt Lake City, UT 84145-0360
 Tel (801) 324-5111 or (800) 323-5517

06/14/2014

URGENT NOTICE (AVISO URGENTE)

Account: [REDACTED]

Dear Dell Ellertson:

One or more addresses associated with the above account has a past-due balance. If you do not pay the past-due amount of [REDACTED] or make credit arrangements **within 10 days** of the date on this notice, natural gas service may be terminated. If arrangements are made and not honored, service may be terminated without additional notice.

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Sincerely,
 Questar Gas

10DAYTERM

Please write your account number on your check and return this portion with your payment.



Account	Total Amount Due	Amount Enclosed
[REDACTED]	[REDACTED]	

Questar Gas Company
 PO Box 45841
 Salt Lake City, UT 84139-0001

#BWNJVBK
 Dell Ellertson
 280 E Southgate Ave
 South Salt Lake UT 84115-3616





Questar Gas Company
 1140 West 200 South
 P.O. Box 45360
 Salt Lake City, UT 84145-0360
 Tel (801) 324-5111 or (800) 323-5517

07/17/2014

URGENT NOTICE (AVISO URGENTE)

Account: [REDACTED]

Dear Dell Ellertson:

One or more addresses associated with the above account has a past-due balance. If you do not pay the past-due amount of [REDACTED] or make credit arrangements **within 10 days** of the date on this notice, natural gas service may be terminated. If arrangements are made and not honored, service may be terminated without additional notice.

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Sincerely,
 Questar Gas

10DAYTERM

Please write your account number on your check and return this portion with your payment.



Account	Total Amount Due	Amount Enclosed
[REDACTED]	[REDACTED]	

Questar Gas Company
 PO Box 45841
 Salt Lake City, UT 84139-0001

#BWNJVBK
 Dell Ellertson
 280 E Southgate Ave
 South Salt Lake UT 84115-3616





Questar Gas Company
 1140 West 200 South
 P.O. Box 45360
 Salt Lake City, UT 84145-0360
 Tel (801) 324-5111 or (800) 323-5517

09/18/2014

URGENT NOTICE (AVISO URGENTE)

Account: [REDACTED]

Dear Dell Ellertson:

One or more addresses associated with the above account has a past-due balance. If you do not pay the past-due amount of [REDACTED] or make credit arrangements **within 10 days** of the date on this notice, natural gas service may be terminated. If arrangements are made and not honored, service may be terminated without additional notice.

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Sincerely,
 Questar Gas

10DAYTERM

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Account	Total Amount Due	Amount Enclosed
[REDACTED]	[REDACTED]	

Questar Gas Company
 PO Box 45841
 Salt Lake City, UT 84139-0001

#BWNJVBK
 Dell Ellertson
 280 E Southgate Ave
 South Salt Lake UT 84115-3616





Questar Gas Company
 1140 West 200 South
 P.O. Box 45360
 Salt Lake City, UT 84145-0360
 Tel (801) 324-5111 or (800) 323-5517

01/14/2015

URGENT NOTICE (AVISO URGENTE)

Account: [REDACTED]

Dear Dell Ellertson:

One or more addresses associated with the above account has a past-due balance. If you do not pay the past-due amount of [REDACTED] or make credit arrangements **within 10 days** of the date on this notice, natural gas service may be terminated. If arrangements are made and not honored, service may be terminated without additional notice.

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Sincerely,
 Questar Gas

10DAYTERM

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Account	Total Amount Due	Amount Enclosed
[REDACTED]	[REDACTED]	

Questar Gas Company
 PO Box 45841
 Salt Lake City, UT 84139-0001

#BWNJVBK
 Dell Ellertson
 280 E Southgate Ave
 South Salt Lake UT 84115-3616



EXHIBIT "B"



Questar Gas Company
333 South State Street
P.O. Box 45433
Salt Lake City, UT 84145-0433
Tel 801 324 5820 • Fax 801 324 5935
Leora.Price@Questar.com

Leora Price, ACP
Advanced Certified Paralegal

October 15, 2015

Dell Ellertson
280 E. Southgate Avenue
So. Salt Lake, UT 84115

VIA Certified Mail

RE: Formal Complaint of Dell Ellertson
PSC Docket No. 15-057-15

Dear Mr. Ellertson:

Thank you for taking the time and calling me back to discuss your complaint.

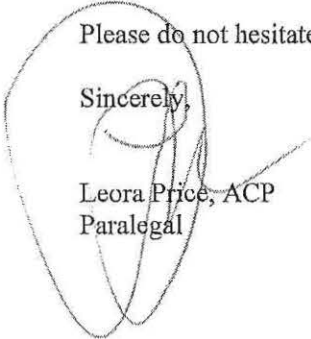
As a follow up to our conversation, this letter is to confirm that you gave me oral permission to place the account for 280 E. Southgate Avenue, So. Salt Lake, Utah in your name. If that is not correct, please contact me at 801-324-5820 prior to October 22, 2015, to let me know. Unless I hear differently from you, natural gas service will be turned on at your home on October 22, 2015. As indicated in our phone call this date, there is a \$15.00 connection which fee is being waived. If you agree to have the service in your name, the activation process is as follows: Questar Gas will read your meter, remove the meter seal and conduct a spot test. You will then need a qualified contractor to light the pilots on your natural gas appliances.

As I also explained, the collections process for the past amount owed was stopped by Questar Gas Company on October 12, 2015. Questar Gas will not pursue from you any past due amounts that were not incurred by you.

Questar Gas Company is requesting that you dismiss your complaint filed with the Public Service Commission once service has been restored. If you are willing to dismiss your complaint filed with the Public Service Commission, please contact Gary Widerburg at 801-530-6713.

Please do not hesitate to contact me should you have any questions or concerns.

Sincerely,



Leora Price, ACP
Paralegal

7011 2970 0003 6016 4399

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only. No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$.48 ⁵
Certified Fee	3.45
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 3.93⁵

Postmark
Here
MAY 5 2006

Sent To **Dell Ellertson**
 Street, Apt. No.,
 or PO Box No. **280 e. Southgate Avenue**
 City, State, ZIP+4 **So. Salt Lake, UT 84115**

PS Form 3800, August 2005 See Reverse for Instructions

EXHIBIT "C"



Questar Gas Company
333 South State Street
P.O. Box 45433
Salt Lake City, UT 84145-0433
Tel 801 324 5820 • Fax 801 324 5935
Leora.Price@Questar.com

Leora Price, ACP
Advanced Certified Paralegal

October 19, 2015

Dell Ellertson
280 E. Southgate Avenue
So. Salt Lake, UT 84115

RE: Formal Complaint of Dell Ellertson
PSC Docket No. 15-057-15

Dear Mr. Ellertson:

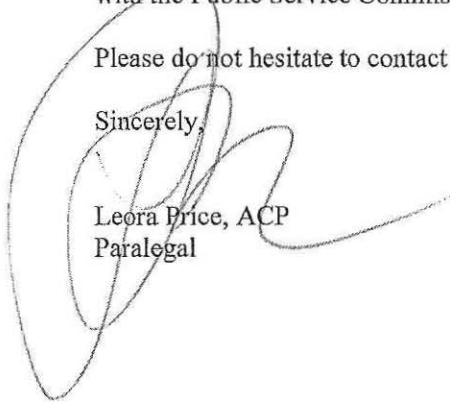
This letter is in follow up to my voicemail message left this date advising that natural gas service has been restored at your property commonly known as 280 E. Southgate Avenue, So. Salt Lake City, Utah. As further indicated in my voicemail message, the meter has been placed in the off position and secured by a zip-tie. A qualified person will need to cut the zip-tie, turn the valve on the gas meter to the on position and light the appliances. If you have any questions regarding this process, you can contact Ask-a-Tech at 801-324-1661.

As set forth in my prior communication, the collections process for the past amount owed was stopped by Questar Gas Company on October 12, 2015. Questar Gas will not pursue from you any past due amounts that were not incurred by you.

Again, Questar Gas Company is requesting that you dismiss your complaint filed with the Public Service Commission as natural gas service has been restored. If you are willing to dismiss your complaint filed with the Public Service Commission, please contact Gary Widerburg at 801-530-6713.

Please do not hesitate to contact me should you have any questions or concerns.

Sincerely,



Leora Price, ACP
Paralegal