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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE JOINT NOTICE AND APPLICATION OF QUESTAR GAS COMPANY AND DOMINION RESOURCES, INC. OF PROPOSED MERGER OF QUESTAR CORPORATION AND DOMINION RESOURCES, INC.	Docket No. 16-057-01 Comments of UAE on Dominion/Questar Merger
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The Utah Association of Energy Users (“UAE”) has not sponsored testimony in this docket, electing instead to rely upon investigations into public interest implications of the proposed merger by the Division of Public Utilities (“Division”) and the Office of Consumer Services (“Office”). Having reviewed the direct testimony filed by these parties, UAE is filing these comments, in the form of unsworn comments or testimony, to explain UAE’s views in this docket.

Witnesses for the Division and Office appear to have completed a careful review of public interest considerations implicated by the proposed merger. They have identified a number of areas and issues with respect to which they believe further commitments will be necessary in order for the interests of Utah ratepayers to be adequately protected. UAE applauds the efforts of the Division and Office to protect Utah ratepayers and urges the Commission to carefully

consider and adopt the suggestions of the Division and Office as necessary or appropriate to protect Utah ratepayers. To the extent the Commission imposes conditions upon its approval of the merger, UAE requests that the conditions be clear and specific in imposing obligations that can be measured and enforced.

Curtis Chisholm also filed direct testimony in this docket on behalf of the American Natural Gas Council, Inc. UAE shares Mr. Chisholm's concerns regarding inefficiencies and costs that are unnecessarily being imposed on Utah transportation customers by virtue of some of Questar Gas Company's elective practices, such as its refusal to follow the industry-standard practice of recognizing and dealing directly with agents and suppliers. While some solutions to the concerns identified by Mr. Chisholm might have revenue implications that can best be addressed in a general rate case, other potential responses may not have significant revenue implications. UAE urges the Commission, at a minimum, to include as a condition to approval of the Dominion/Questar merger a requirement that the merged company must in good faith address the types of concerns raised in Mr. Chisholm's testimony through evaluation and adoption of appropriate industry best practices.

DATED this 28th day of July 2016.

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 28th day of July 2016 on the following:

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