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State of Utah  
DEPARTMENT OF COMMERCE  
Office of Consumer Services

MICHELE BECK  
Director

To: Utah Public Service Commission

From: Office of Consumer Services  
Michele Beck, Director  
Béla Vastag, Utility Analyst

Date: February 7, 2017

Re: In the Matter of Questar Gas Company's Application to Modify Its Tariff to Include Gas Quality Specifications and Provisions Pertaining to Biomethane Docket No. 16-057-T06

### Background

In our January 11, 2017 comments<sup>1</sup> on this matter, the Office of Consumer Services (Office) requested that the Public Service Commission of Utah (Commission) suspend Questar Gas Company's (Company) proposed tariff to allow more time for parties to investigate the issues surrounding the potential transportation of biomethane gas on the Company's system and the potential mixing of biomethane gas into the Company's gas supply. The Office also requested that the Company file additional information on these biomethane issues in order to create a more robust record to assist the Commission in ensuring that the public interest is upheld.

On January 20, 2017, the Commission issued both an Order suspending the Company's proposed tariff and a Notice of Scheduling Conference. After the scheduling conference, on January 24, 2017, the Commission issued a Scheduling Order and Notice of Technical Conference. As a result of the Scheduling Order, the Company filed additional comments supplementing the record on January 27, 2017. In addition, a technical conference was scheduled and held on January 31, 2017 and a deadline for responsive comments (based on the Company's additional comments and the technical conference) was set for February 7, 2017.

### Responsive Comments

The Office met informally with the Company on January 18, 2017 where the Company responded to the Office's list of questions concerning safety and cost issues related to the

<sup>1</sup> <http://pscdocs.utah.gov/gas/16docs/16057T06/291186CommfromOCS1-11-2017.pdf>

transportation of biomethane gas on the Company's system. The Office also reviewed the Company's additional comments filed on January 27 and attended the technical conference on January 31. Through this process, the Company has answered all of the Office's questions and has demonstrated that it has performed significant due diligence in preparation for the potential introduction of biomethane gas into its system. With the new material (additional comments and technical conference presentation) posted to this docket, the Office now believes that a proper record has been developed from which the Commission can make a public interest determination.

**Recommendations**

The Office recommends that the Commission approve the Company's proposed modifications to Utah Natural Gas Tariff No. 400 which add gas quality specifications and provisions pertaining to biomethane.

In addition, in future filings by Questar Gas (or any other regulated utility) making significant changes to a tariff, the Office recommends that the Commission should require the Company to include supplemental information or testimony completely explaining and supporting the need for the changes. The Office believes that the Commission should allow significant changes to tariffs to become effective only after the utility has created a robust public record within the docket demonstrating that the changes are in the public interest.

CC: Chris Parker, Division of Public Utilities  
Barrie McKay, Questar Gas Company