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Attorneys for Questar Gas Company dba Dominion Energy Utah

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE REQUEST FOR AGENCY ACTION AND COMPLAINT OF US MAGNESIUM, LLC AGAINST DOMINION ENERGY UTAH

Docket No. 17-057-13

AFFIDAVIT OF BRUCE RICKENBACH

STATE OF UTAH)
):ss
COUNTY OF SALT LAKE)

- I, Bruce Rickenbach, being first duly sworn under oath, do hereby state and depose as follows:
- I am the Supervisor of Account and Municipal Relations for Questar Gas
 Company dba Dominion Energy Utah ("Dominion Energy" or "Company"). My department is responsible for the management of large commercial and industrial accounts.
- 2. I am personally familiar with the facts set forth in this affidavit and, if called upon to testify, could and would affirm the matters set forth herein.

- 3. I have reviewed US Magnesium's Motion for Summary Judgment. In that Motion, US Magnesium claims that its employees, including Mike Tucker and presumably Roger Swenson as well, were not permitted, for security reasons, to have mobile telephones in the plant. As such, US Magnesium claims that the mobile telephone numbers provided in the Customer Information Sheet Mr. Swenson provided to me were not reliable numbers to use during daytime hours.
- 4. I do not recall Mr. Tucker, Mr. Swenson or any other US Magnesium employee ever informing me nor, to my knowledge, did they inform anyone at the Company, that employees of US Magnesium were not allowed to have mobile telephones in the plant. In addition, neither Mr. Tucker, Mr. Swenson nor any other US Magnesium employee ever informed me or to my knowledge anyone at the Company of Mr. Tucker's or Mr. Swenson's working hours. As such, the Company and I would have no way of knowing when Mr. Tucker or Mr. Swenson work in the plant (e.g., day shift or evening shift).
- 5. In its Motion, US Magnesium claims that, because mobile telephone numbers could not be used in the plant, they are "an unreliable method of contacting US Magnesium on an interruption during the daytime hours." (Motion at viii (Paragraph 15.) However, no one at US Magnesium informed me or to my knowledge anyone else at the Company that, the mobile telephone numbers US Magnesium provided were unreliable for interruption notices during daytime hours. US Magnesium did not include any such disclosure in the Customer Information Sheet. Also, I was able to speak with Mr. Swenson about the interruption on January 6, 2017 during daytime hours, and the Company has been able in the past to use mobile telephone numbers and email addresses to send leave telephone messages, send texts and send emails to provide US Magnesium with notice of interruptions.

- 6. I also understand that US Magnesium claims in its Motion that it expected the Company to notify US Magnesium of daytime interruptions using only the "Day Phone" numbers listed on the Customer Information Sheet. However, my November 2016 email to US Magnesium that included the Customer Information Sheet notified US Magnesium that the Company would attempt to contact it simultaneously through texts, emails and voice messages using the numbers or email addresses provided. That is also how the Company has notified US Magnesium of prior recent interruptions.
- 7. US Magnesium also claims that, during prior interruptions, the Company was able to dial through to extensions. This is incorrect. Since 2012, none of the Company's electronic notification systems have been unable to dial through to extensions. That said, US Magnesium has never complained to me during those interruptions about being contacted through the other numbers or email addresses US Magnesium provided.
- 8. In its Motion, US Magnesium notes the Company has changed its form Customer Information Sheet to substitute the term "Notification Contacts" for "Interruption Contacts."

 This change was made because the Company uses the contact information to contact customers for more than just interruptions.
- 9. During my discussions and email exchanges with US Magnesium following the January 6, 2017 interruption, neither Mr. Tucker nor Mr. Swenson told me that, on January 6, 2017, they did not know that the emails and texts came from the Company.

[Signature Page Follows]

DATED this 14th day of February 2018.

Bruce Rickenbach

SUBSCRIBED AND SWORN before me this 14th day of February 2018.

LEORA N. PRICE

Notary Public State of Utah My Commission Expires on: August 19, 2018 Comm. Number: 677.685