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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 OF
DOMINION ENERGY UTAH FOR
APPROVAL OF A VOLUNTARY
RESOURCE DECISION TO CONSTRUCT
AN LNG FACILITY

Docket No. 18-057-03

**PETITION FOR HIGHLY
CONFIDENTIAL TREATMENT
AND ADDITIONAL PROTECTIVE
MEASURES UNDER UTAH
ADMINISTRATIVE CODE RULE
R746-1-601(2)(a)**

Pursuant to Utah Admin. Code Rule R746-601(2), Questar Gas Company dba Dominion Energy Utah (“Company” or “Dominion Energy”) hereby petitions the Public Service Commission of Utah (“Commission”) to (i) authorize Dominion Energy to designate certain information contained in exhibits supporting the Company’s Application in this matter as “Highly Confidential,” and (ii) approve additional protective measures for those materials, namely, approve Magnum Energy Midstream Holdings’ (“Mangum”) and Dominion Energy

Questar Pipeline LLC's ("DEQP") requests that information designated in the Company's exhibits as "Highly Confidential" not be made available to their competitors or counsel for their competitors. Magnum identified the following competitors: Ryckman Creek Storage LLC ("Ryckman"), DEQP and Kern River Gas Transmission Company ("Kern River"). DEQP has identified Magnum, Kern River and Ryckman as competitors.

BACKGROUND

1. As part of Dominion Energy's attempts to investigate potential supply reliability options for its system, it contacted Magnum to determine whether Magnum could offer any options that should be considered in the analysis.

2. Before Magnum would participate in substantive discussions with the Company regarding this issue, Magnum required Dominion Energy first to execute a non-disclosure agreement ("NDA") that would govern those discussions and require Dominion Energy to treat certain information Magnum provided as "Confidential Information."

3. With regard to Confidential Information, the NDA generally prevents Dominion Energy from disclosing that information without Magnum's consent, but contains several exceptions to the confidentiality requirement. One such exception allows the Company to disclose Confidential Information if it is required by legal and regulatory requirements to do so. However, in that instance, the NDA dictates that the Company must provide Mangum with advanced notice of the required disclosure and petition for "Highly Confidential" treatment if Magnum believes such treatment is necessary to protect its interests.

4. As discussed above, exhibits supporting the Company's Application in this matter contain Confidential Information and the Company believes it is required by applicable statutes and regulations to provide that information to the Commission along with its Application and

supporting materials. Because of this, and in compliance with the NDA, on April 24, 2018, Dominion Energy sent a letter to Mangum, notifying Magnum that the Company was required to provide Confidential Information to the Commission in this matter. In that letter, the Company indicated to Magnum that, if Magnum believed the information warranted a higher level of protection, it should notify Dominion Energy of that belief by April 26, 2018.

5. On April 26, 2018, Magnum sent an email to Dominion Energy in which it stated:

“Magnum is concerned that designating the information as only “Confidential Information” would create the possibility that Magnum’s competitors may obtain the information to Magnum’s detriment. Accordingly, Magnum requests that Dominion Energy designate the information as “Highly Confidential” under Rule R746-1-601 and negotiate or seek a Commission order that prohibits the information from being disclosed to any of Magnum’s competitors, including Ryckman Creek Gas Storage LLC, Dominion Energy Questar Pipeline, LLC and Kern River Gas Transmission Company, as authorized by R746-1-601(2)(b)(iii).”

6. As a result of this request by Magnum, the Company has filed this Petition.

However, in discussions with representatives of DEQP, DEQP has indicated that it desires the same protection.

ARGUMENT

The Utah Administrative Code provides, in relevant part, as follows:

- (a) A person that files or is requested to provide information that the person considers to be highly confidential shall promptly:
 - (i) negotiate with the other parties mutually agreeable protections; or
 - (ii) petition the Commission for an order granting additional protective measures.
- (b) The petitioning party shall set forth:
 - (i) the particular basis for the claim;
 - (ii) the specific, additional protective measures requested, which may include restricting or prohibiting specific individuals from accessing information; and

(iii) the reasonableness of the requested, additional protection.

Utah Admin. Code Rule R746-601(2)(a) & (b).

As discussed above, the basis for this Petition is the fact that Magnum and DEQP have notified the Company of their belief that the Confidential Information contained in Dominion Energy's exhibits is competitively sensitive and could be used by competitors to gain an unfair and improper competitive advantage if they were able to obtain that information. Dominion Energy lacks the information to know what information is and is not competitively sensitive to Magnum or DEQP. However, the information at issue does contain pricing and what appears to be some proprietary information the Company would expect is not made available to Magnum's or DEQP's respective competitors. For that reason, the Company believes the relief sought in this Petition is warranted.

With regard to the additional protective measures sought in this Petition, Dominion Energy seeks Commission approval of the measure requested by Magnum: that Ryckman, DEQP, and Kern River, and their respective counsel, not be permitted to review the portions of the Company's exhibits that contain Highly Confidential information pertaining to Magnum. The Company requests that the same protections be afforded to DEQP, namely that Magnum, Ryckman and Kern River, and their respective counsel, not be permitted to review the portions of the Company's exhibits that contain Highly Confidential Information pertaining to DEQP. This protective measure is reasonable under the circumstances for several reasons. First, it is unknown at this point whether any of the identified competitors will intervene in this matter. Second, even if they were to intervene, there is no obvious reason why they would need access to the Highly Confidential information, as that information has no direct relevance to them.

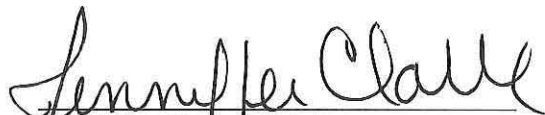
Finally, if the identified competitors later proffered a legitimate reason for needing the information, the Commission could assess at that time whether the proffered reason justifies a modification of Magnum's and DEQP's requested protective measure.

REQUEST FOR RELIEF

For the foregoing reasons, and pursuant to Utah Admin. Code Rule R746-601(2), Dominion Energy respectfully requests that the Commission issue an order pursuant to Utah Admin. Code Rule R746-601(2) authorizing the Company to treat Confidential Information provided by Magnum and DEQP as Highly Confidential and approving Magnum and DEQP's requests that the identified competitors and their attorneys not be permitted to review the portions of the Company's exhibits that contain Highly Confidential information as more fully set forth above.

DATED this 30th day of April, 2018.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing **PETITION FOR HIGHLY CONFIDENTIAL TREATMENT AND ADDITIONAL PROTECTIVE MEASURES UNDER UTAH ADMINISTRATIVE CODE RULE R746-1-601(2)(a)** was served upon the following persons by email on April 30, 2018:

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