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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of the Investigation of Dominion Energy's Gas Line Coverage Letter</p>	<p>Docket No. 18-057-07</p> <p>PETITION FOR HIGHLY CONFIDENTIAL TREATMENT AND ADDITIONAL PROTECTIVE MEASURES UNDER UTAH ADMINISTRATIVE CODE RULE R746-1-601(2)(a) AND MOTION FOR EXPEDITED TREATMENT</p>
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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 provided to the Parties in this matter as "Highly Confidential," and (ii) approve additional protective measures for those materials, namely, approve the request that information designated as "Highly Confidential" not be made available to any intervenors or their counsel in this matter or to any person other than as

specified below in “Background”, paragraph 2. The Company also moves the Commission for expedited treatment of this Petition in order that the requested information be made available as soon as possible, before the deadline for comments on June 28, 2018.

BACKGROUND

1. The Utah Office of Consumer Services (“Office”) has issued Data Requests in this matter seeking information about HomeServe USA’s (“HomeServe”) programs. Dominion Energy Utah does not have access to the requested information. HomeServe possesses the information and considers portions of this information to be Highly Confidential, meaning that HomeServe reasonably and in good faith believes that the information contains (i) trade secrets, or (ii) other information that is proprietary or competitively sensitive to its current or future business operations such that its disclosure would cause substantial and irreparable competitive injury to HomeServe.

2. HomeServe has indicated a willingness to provide the information if the Commission will afford the information heightened protections such that the information designated by HomeServe as Highly Confidential be provided to the Commission, the Office and the Utah Division of Public Utilities (“Division”) and their counsel, but that any intervenors in this docket and their counsel, and any other person, will be prohibited from viewing the material.

3. Counsel for the Office and the Division have indicated that the Office and Division do not oppose this Petition.

4. Therefore, the Company requests that the Commission grant this motion affording Highly Confidential treatment to the identified information as more fully set forth below.

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 HomeServe is willing to provide the requested information but deems certain portions of the information to be Highly Confidential, meaning that HomeServe reasonably and in good faith believes that the information contains (i) trade secrets, or (ii) other information that is proprietary or competitively sensitive to its current or future business operations such that its disclosure would cause substantial and irreparable competitive injury to HomeServe. Dominion Energy lacks the information to know what information is and is not competitively sensitive to HomeServe. However, the information at issue does contain what appears to

be some proprietary information the Company would expect is not made available to HomeServe's 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 HomeServe, such that any intervenors and their counsel, and any person (other than the Commission, the Office, the Division and their respective counsel) not be permitted to review the Data Request responses that contain Highly Confidential information pertaining to, and as designated by, HomeServe. This protective measure is reasonable under the circumstances for several reasons. First, it is unknown at this point whether there will be any intervenors 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.

Additionally, if any intervenors later proffered a legitimate reason for needing the information, the Commission could assess at that time whether the proffered reason justifies a modification of HomeServe's requested protective measure.

Counsel for the Company has discussed this matter with counsel for the Office and the Division and neither entity opposes this Petition.

Finally, the Company respectfully requests expedited treatment of this Petition such that the parties may have access to the requested information in advance of the June 28, 2018 deadline for filing comments.

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 authorizing the Company to treat information provided and designated by HomeServe as Highly

Confidential and approving HomeServe's requests that the information be provided to the Commission, the Office and the Division and their respective counsel, but that any intervenors and their respective attorneys, and any other person, not be permitted to review the portions of the Company's exhibits that contain such Highly Confidential information as more fully set forth above.

RESPECTFULLY SUBMITTED this 19th day of June, 2018.

DOMINION ENERGY UTAH



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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of Petition for Highly Confidential

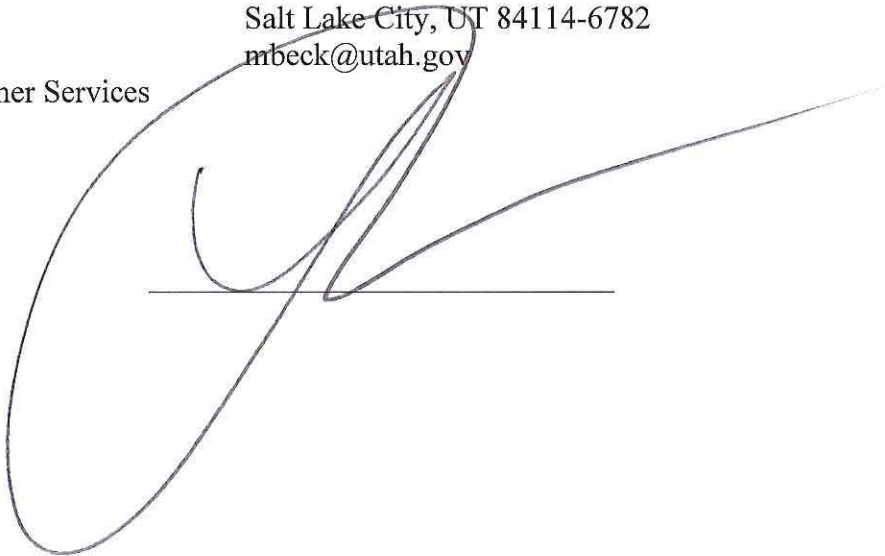
Treatment was served upon the following persons by e-mail on June 19, 2018:

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A large, stylized handwritten signature in black ink, appearing to be 'Michele Beck', is written over a horizontal line. The signature is highly cursive and loops around the line.