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- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

)	
)	Docket No. 08-999-06
)	
IN THE MATTER OF THE)	
CONSIDERATION OF THE AMENDMENT)	QUESTAR GAS COMPANY’S
OF TITLE 15 U.S.C. 303(b) BY THE U.S.)	COMMENTS ON THE ADOPTION OF
ENERGY INDEPENDENCE AND SECURITY)	STANDARDS CONSISTENT WITH
ACT OF 2007)	THE ENERGY INDEPENDENCE AND
)	SECURITYACT OF 2007
)	
)	

Questar Gas Company (Questar Gas or Company) respectfully provides these comments pursuant to the Commission’s Request for Comments (Request) issued June 2, 2009.

PROCEDURAL BACKGROUND AND OVERVIEW

On September 8, 2008, the Public Service Commission of Utah (the Commission) issued a Notice of Technical Conference to address, among other things, “the new energy efficiency and rate design modifications to promote energy efficiency investments standards applicable to natural gas utilities enacted by the U.S. Energy Independence and Security Act of 2007. . .” The Technical Conference was held on November 5, 2008 and on May 28, 2009, the Division of Public Utilities (the Division) filed a Memorandum regarding the Evaluation of the Two New

Standards Added to PURPA (Retail Policies for Natural Gas Utilities) by the 2007 Energy Independence & Securities Act (EISA) (the Division's Memorandum). On June 2, 2009, the Commission issued a Request for Comments upon the Division's Memorandum. Questar Gas submits these comments pursuant to that Request for Comments.

COMMENTS

Questar Gas appreciates the opportunity to comment and to participate in discussions regarding this important issue. Questar Gas generally agrees with and supports the comments set forth in the Division's Memorandum. Questar Gas notes that the Division recognized that the Conservation Enabling Tariff (the CET) "does not incent the Company to pursue [Demand Side Management (DSM)] programs in any particular way" and that, in fact, the CET simply "removed any `disincentive' for the Company to actively promote DSM programs to its customers by decoupling the fixed cost recovery portion of costs through its revenue from the sales volumes and volumetric rates." Division Memorandum at p. 8. Questar Gas believes that the CET was essential to ensuring that Questar Gas' interests and the interests of its customers were properly aligned with respect to energy efficiency, and that it removed a disincentive or a barrier to the wholehearted promotion of energy efficiency programs. Questar Gas does not believe that the CET serves as an "incentive" to promote energy efficiency, as contemplated by Standard 6 from subsection 3203(b) of EISA. The Division agrees and further notes that "it does not appear that an `incentive' was considered for the successful management of energy efficient programs as required in Subtitle (B), option (ii)." *Id.*

Questar Gas looks forward to the opportunity to further participate in the dialogue related to the implementation of the standards for natural gas utilities set forth in EISA. Questar Gas also welcomes the opportunity to participate in the development and implementation of incentives that are cost effective, just, reasonable and in the public interest.

DATED this 16th day of July, 2009.

Respectfully submitted,

QUESTAR GAS COMPANY

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 16th day of July 2009, to the following:

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