

Colleen Larkin Bell (5253)
Jenniffer Nelson Clark (7497)
Questar Gas Company
333 South State Street
P.O. Box 45360
Salt Lake City, Utah 84145-0360
(801) 324-5392
(801) 324-5935 (fax)
Jenniffer.Clark@Questar.com

Attorneys for Questar Gas Company

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Potential Amendments to
Utah Administrative Code R746-100

Docket No. 16-R100-02

**QUESTAR GAS COMPANY'S
COMMENTS AND REQUEST FOR
TECHNICAL CONFERENCE**

Questar Gas Company (Questar Gas or Company) respectfully submits these comments and request for technical conference in response to the Request for Comments issued on May 17, 2016 (the Request). The Request invites comments regarding potential amendments to R746-100 to simplify and update the referenced rules.

Request for Technical Conference and Scheduling Conference

Questar Gas observes that some of the proposed rule changes appear to be substantive. The Company also notes that the rules function as a whole and that changes in some sections can materially impact other sections. Moreover, the Company anticipates that many parties will have comments related to the proposed rules. Given these facts, the Company believes that an open exchange of information and discussion regarding the Commission's intent and the substance of the rules would be beneficial and would allow all interested parties an opportunity to seek clarification and to voice

concerns. Therefore, Questar Gas respectfully requests that the Commission hold a technical conference, or technical conferences to discuss the proposed changes, and if the technical conference(s) result in a desire on the part of interested parties for further opportunity to submit additional written comments, offer an opportunity for such comment.

Comments

Questar Gas offers the following general comments related to the proposed rules.

1. Proposed R746-1-103(6): The Company notes that an “Interested person” refers to anyone who requests to be placed on the “service list” for the docket. It is unclear what a “service list” may be or how if this definition is distinguishable from a list of intervenors. Questar Gas recommends that the Commission clarify by defining what it means to “request to be placed on the service list.”

2. Proposed R746-1-106 (2): The proposed language suggests that the computation of time is superseded by any conflicting order of the Commission, or applicable statute or rule. Such references may be vague. In order to ensure clarity, the Company recommends that the Commission strike the proposed language and replace it with the following, “The Commission may issue an order that supersedes or modifies this Subsection 106(1) in a given proceeding.”

3. Proposed R746-1-201: The Company notes that, under the proposed rule, any person may file a complaint with the Commission against a public utility. The Company recommends that the Commission modify the rule to allow such complaints for those who are the public utility’s customers. The proposed rule could be read to confer

standing upon individuals who would otherwise not have standing to bring such a complaint.

4. Proposed R746-1-501(1): The red-line version of the proposed rules contains the following language “A party that objects to a discovery request shall file a motion to quash or modify the request.” Because such language does not appear in the clean version of the proposed rules, it is unclear whether it is intended to be included. The Company recommends against the inclusion of such language. To require an objecting party to file a motion to quash for every objection will result in unnecessary administrative burden for both the responding party and the Commission. In the Company’s experience, a written objection is sufficient to prompt the parties to meet and confer in an attempt to resolve the matter. In the overwhelming majority of cases, the Company has successfully resolved any conflicts related to objections without any Commission intervention. Requiring Commission involvement in every proposed objection is unnecessary and would result in an undue burden upon both objecting parties and the Commission.

5. Proposed R746-1-501(3): Questar Gas recommends striking this provision in its entirety for the reasons set forth in comment number 4, above.

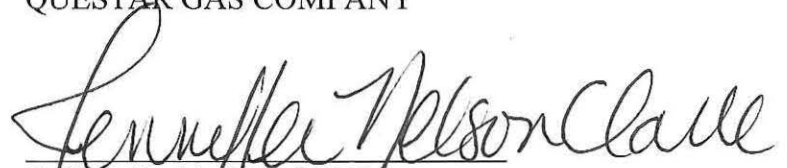
6. Proposed R741-1-606: The Company recommends that the Commission hold a technical conference or technical conferences to discuss in detail the process

surrounding the appropriate designation and use of Confidential and Highly Confidential information, and the manner in which a party may challenge such a designation.

DATED this 18th day of July, 2016.

Respectfully submitted,

QUESTAR GAS COMPANY

A handwritten signature in cursive script that reads "Jennifer Nelson Clark". The signature is written in black ink and is positioned above the printed name and contact information.

Colleen Larkin Bell (5253)
Jennifer Nelson Clark (7947)
Attorneys for Questar Gas Company
333 S. State Street
PO Box 45360
Salt Lake City, Utah 84145-04360
(801) 324-5392

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the Questar Gas Company's Comments and Request for Technical Conference was served upon the following persons by email on July 18, 2016:

Patricia E. Schmid
Justin Jetter
Assistant Attorneys General
160 East 300 South
P.O. Box 140857
Salt Lake City, UT 84114-0857
pschmid@utah.gov
jjetter@utah.gov

Rex Olson
Assistant Attorney General
160 East 300 South, 5th Floor
P.O. Box 140857
Salt Lake City, Utah 84114-0857
rolsen@utah.gov

Chris Parker
Director
Division of Public Utilities
160 East 300 South
P.O. Box 146751
Salt Lake City, UT 84114-6751
chrisparker@utah.gov

Michele Beck
Director
Office of Consumer Services
160 East 300 South
P.O. Box 146782
Salt Lake City, UT 84114-6782
mbeck@utah.gov