

Gary G. Sackett (USB 2841)
JONES, WALDO, HOLBROOK & McDONOUGH, P.C.
170 South Main, Suite 1500
P. O. Box 45444
Salt Lake City, Utah 84145
Phone: (801) 534-7336
Fax: (801) 328-0537

Jonathan M. Duke (USB 6382)
QUESTAR CORPORATION
180 East First South Street
P. O. Box 45360
Salt Lake City, Utah 84145
Phone: (801) 324-5938

Attorneys for Questar Gas Company

Date submitted: May 24, 2002

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF)	DOCKET No. 02-057-02
THE APPLICATION OF)	
QUESTAR GAS COMPANY)	MOTION FOR ENTRY OF
FOR AN INCREASE IN)	PROTECTIVE ORDER
RATES AND CHARGES)	

Questar Gas Company (QGC or the Company) moves the Commission for entry of a Protective Order in the form attached to this motion. In support of its motion, QGC states:

1. During the discovery phase of this proceeding, it is expected that the Company will receive data requests and other discovery requests from the Division of Public Utilities (Division), the Committee of Consumer Services (Committee) and possibly other parties in the case. Responses to these requests may involve information that is confidential in nature and which should be protected from public disclosure.

2. The Commission previously indicated that protective orders will be issued only upon an appropriate showing of their being in the public interest.

3. The breadth of discovery inquiries already received by QGC in this case includes requests for a variety of information that constitutes trade secrets, marketing data, commercially and financially sensitive information, and confidential commercial and business information supplied to QGC by other parties. Public disclosure of this type of information could adversely affect QGC, its customers and others it does business with. It is in the public interest that limited amounts of this type of information be subject to the safeguards and limited dissemination afforded by a protective order.

4. The attached Proposed Protective Order provides a procedure for the expeditious handling and protection of valuable, confidential, trade secret and business information.

5. The entry of the attached Proposed Protective Order will expedite the production of documents and other information in this proceeding to allow for timely case preparation by the Division, the Committee and other parties.

6. Counsel for the Committee and the Division do not oppose this Motion or the attached Proposed Protective Order.

WHEREFORE, Questar Gas Company respectfully requests that the Commission approve and enter the Protective Order attached to this Motion

Respectfully submitted this 24th day of May 2002.

Gary G. Sackett
JONES, WALDO, HOLBROOK & McDONOUGH

Jonathan M. Duke
QUESTAR CORPORATION

Attorneys for Questar Gas Company

CERTIFICATE OF SERVICE

I certify that on this ___th day of May 2002, true and correct copies of Motion for Entry of Protective Order and Proposed Protective Order were hand-delivered to the offices of:

Michael Ginsberg
Assistant Attorney General
Division of Public Utilities
Heber M. Wells Building
160 E. 300 South, 4th floor

Reed Warnick
Assistant Attorney General
Committee of Consumer Services
Heber M. Wells Building
160 E. 300 South, 4th floor

Salt Lake City, UT 84111

Salt Lake City, UT 84111

