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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In re QUESTAR GAS COMPANY

Docket Nos. 04-057-04, 04-057-09,
04-057-11, 04-057-13 and 05-057-01

**QUESTAR GAS COMPANY'S REQUEST
FOR LIMITED RECONSIDERATION,
MOTION FOR ENLARGEMENT OF
TIME TO FILE RESPONSE TO
PETITIONERS' REQUEST FOR
RECONSIDERATION, AND MOTION
FOR EXPEDITED CONSIDERATION OF
QUESTAR GAS COMPANY'S REQUEST**

Pursuant to Utah Code Ann. § 54-7-15, and Utah Admin. Code R746-100-11.F and R746-100.3.H, Questar Gas Company ("Questar Gas" or the "Company") hereby respectfully requests limited reconsideration of the Commission's final Report and Order issued in this matter

on January 6, 2006 (“Order”), for the purpose of allowing the Commission to consider and resolve certain pending discovery issues prior to the expiration of the statutory period after which the Request of Petitioners for Reconsideration of the Report and Order of the Utah Public Service Commission, Issued January 6, 2006, Approving a Gas Management Cost Stipulation (“Petitioners’ Request”) would be deemed denied by operation of law in the absence of Commission order granting Petitioners’ Request. Questar Gas also hereby respectfully moves for (1) an enlargement of time for the Company and other parties to submit any oppositions to Petitioners’ Request until five days after the completion of any discovery allowed by the Commission in this matter; and (2) expedited consideration of Questar’s request for limited reconsideration and motion for an enlargement of time. As grounds for this request and motions, Questar Gas states as follows:

1. Questar Gas has sought to obtain discovery from certain Petitioners among those whose names appear on Appendix A to Petitioners’ Request. Petitioners have filed an Objection to Subpoenas, Motion to Quash, and Motion for Protective Order (“Objection”) in which Petitioners seek to prevent the discovery from being obtained. The Commission has tentatively scheduled argument on the Objection for Tuesday, February 21st.

2. Questar Gas will not argue the merits of the Opposition here. Suffice it to say that if the Commission allows Questar Gas to proceed with certain discovery, some portion of that discovery may appropriately warrant treatment in the opposition to Petitioners’ Request the Company intends to file. However, under the current schedule as established by Commission Rule R746-100-11.F, the Company’s response to Petitioners’ Request is due on February 21st, the very day the Commission will be hearing argument on whether to permit Questar Gas to engage in discovery.

3. Thus, in the event the Commission determines to allow Questar Gas to pursue discovery, without an enlargement of time for Questar Gas to file its opposition, at best the Company's opposition will be due on the same day it receives permission from the Commission to conduct discovery (assuming the Commission issues its order approving discovery the same day it hears the argument), and Questar Gas will have had no opportunity to actually conduct the permitted discovery let alone incorporate any relevant information in its opposition to Petitioners' Request.

4. In the absence of relief from the current deadline for Questar Gas and other parties to file opposition to Petitioners' Request, therefore, any permission the Company receives to conduct discovery will be meaningless because Questar Gas will not be able to accomplish the discovery before the time expires to oppose Petitioner's Request.

5. Because the 20-day period after which a petition for reconsideration is deemed denied by operation of law is statutory (*see* Utah Code Ann. § 54-7-15), the most appropriate way for the Commission to enlarge the time to allow meaningful consideration of whether to allow the Company to pursue discovery, and then allow time for Questar Gas to conduct that discovery (allowing an appropriate amount of time for Petitioners to prepare for and schedule depositions), is to grant limited reconsideration of the Order and prevent the Order from becoming final and appealable until such time as the discovery issues are resolved.

6. Limited reconsideration to allow appropriate consideration of these discovery issues is consistent with past Commission practice and would not prejudice Petitioners or any other party. It will only cause a brief delay in these proceedings, which delay is justified by the fact that in the absence of an enlargement of time Questar Gas will be prejudiced by an inability

to complete its desired discovery even if the Commission ultimately agrees with the Company that the discovery is appropriate.

Wherefore, Questar Gas requests the following relief:

1. That the Commission grant limited reconsideration for the purposes of allowing time to consider the appropriateness of Questar Gas's proposed discovery, and to allow Questar Gas to conduct that discovery if approved by the Commission.

2. That the period for Questar Gas and other parties to submit responses to Petitioners' Request be enlarged until five business days after: (a) an order by the Commission denying Questar Gas the opportunity to conduct discovery; or (b) assuming discovery is permitted, five business days after the completion of the discovery.

3. That the new date for the Order to be considered final and the Petitioners' Request be deemed denied, in the absence of a further Commission order granting reconsideration to Petitioners, be five calendar days after the date on which any oppositions to Petitioners' Request are due under paragraph 2 above.

Questar moves for expedited consideration of these issues, given the fact that absent the relief requested herein Questar Gas's opposition to Petitioners' Request will be due next Tuesday. The Company specifically and respectfully requests that the Commission issue an order on this request and motions by Friday, February 17, 2006.

RESPECTFULLY SUBMITTED: February 15, 2006.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **QUESTAR GAS COMPANY'S REQUEST FOR LIMITED RECONSIDERATION, MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSE TO PETITIONERS' REQUEST FOR RECONSIDERATION, AND MOTION FOR EXPEDITED CONSIDERATION OF QUESTAR GAS COMPANY'S REQUEST** was served upon the following by electronic and first-class mail, on February 15, 2006:

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