

BRUCE PLENK
2958 N. St Augustine Place
Tucson, AZ 85712
Attorney at Law (Arizona & Utah)
520 795-8611; FAX 520 207-2327
[email:bplenk@igc.org](mailto:bplenk@igc.org)

July 13, 2010

Chairman Ted Boyer
Commissioners Campbell and Allen
Utah Public Service Commission
160 East 300 South
Salt Lake City, UT 84145

Re: Application of Questar Gas Company for a Tariff Change
Implementing a Low-Income Assistance Program and Action
Request to DPU in Docket No. 10-057-08

Dear Commissioners:

Questar recently filed its Application for Implementation of a Low-Income Assistance Program, in compliance with Paragraph 23 of the Settlement Stipulation adopted by this Commission's Report and Order of June 3, 2010 in Docket No. 09-057-16. AARP and Salt Lake Community Action Program (SLCAP) support the proposed implementation plan as detailed in the proposed tariff sheets as a reasonable introduction to an assistance program for Questar's low income Utah gas customers. The plan as proposed will clearly assist those customers who have the greatest difficulty paying their gas bills, is in the public interest and as a part of the overall stipulation in this case, is just and reasonable. The plan proposed by Questar was the result of a series of meetings where interested parties worked together to develop a reasonable program which could start this heating season.

This new program will likely need to be revised as experience in the future dictates. Utah Code Ann. Section 54-7-13.6 (6) (c) allows the

total funding for the program, the monthly billing credit and monthly surcharge to be reviewed in general rate cases as well as when “determined by the commission.” Given the annual changes in the number of recipients of this new program, a review and recalibration of the credit and the surcharge appears to be necessary before each heating season to assure optimal administration of the program. While contrary to the Division’s legal position in its recent memo, AARP and SLCAP believe that the stature allows the Commission to conduct a review of all aspects of the program, if necessary, between Questar general rate cases. This would be consistent with Commission practice regarding the Rocky Mountain Power HELP program.

AARP and SLCAP are committed to working with Questar to improve this program over time. AARP and SLCAP thus request the Commission direct Questar to continue working with all interested parties to develop possible future program revisions as the program is implemented and needed changes become apparent. This might well include opportunities to develop and preview such changes before they are submitted to the Commission. AARP and SLCAP also believe that a tiered program as recommended in the 2009 Low Income Task Force Report should be adopted in the future, ideally growing out of such multi-party meetings. This would accomplish the goal of providing greater assistance to those in the most need, as Questar acknowledged in paragraph 9 of its Application.

AARP and SLCAP appreciate this important development to assist low income ratepayers. We look forward to deployment later this year and working collaboratively with all parties to improve the program in the future.

Sincerely yours,

s/
Bruce Plenk
Attorney for AARP

MAILING CERTIFICATE

I certify that on the __13 day of _July, 2010, I sent an electronic copy of the above to all parties via e-mail.

s/ _____
Bruce Plenk