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*Attorneys for Questar Gas Company*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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IN THE MATTER OF THE APPLICATION  
OF QUESTAR GAS COMPANY FOR  
APPROVAL OF THE WEXPRO II  
AGREEMENT

Docket No. 12-057-13

**QUESTAR GAS COMPANY'S  
RESPONSE TO THE DIVISION OF  
PUBLIC UTILITIES' MOTION  
OPPOSING OFFICE OF CONSUMER  
SERVICES' BRIEFING REQUEST AND  
REQUEST FOR EXPEDITED  
TREATMENT AND SHORTENED  
RESPONSE TIME**

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Questar Gas Company (“Questar Gas” or the “Company”) responds to the Division of Public Utilities’ Motion Opposing Office of Consumer Services’ Briefing Request and Request for Expedited Treatment and Shortened Response Time (“Motion”) filed in this docket on January 28, 2013. The Company supports the Motion. The Company will not repeat the

arguments in the Motion, but provides the following additional information in support of the Motion.

Following the filing of the Application in this docket, the Office filed a Request for Pre-Hearing Order and Schedule (“Request”). The Request identified certain claimed legal deficiencies with the Application, including arguments regarding jurisdiction, the relationship between the Wexpro II Agreement and the Wexpro Stipulation and Agreement (“Wexpro I”), the circumstances surrounding Wexpro I, and the Division of Public Utilities’ (“Division”) authority to enter into the Wexpro II Agreement. Questar Gas and the Division filed responses accepting certain procedural aspects of the Request and objecting to other aspects. Both parties noted that the issues raised by the Office were legal issues that could be addressed through briefing prior to proceeding with testimony in this matter.

The Commission held a scheduling conference on October 3, 2012, to set a schedule in the matter. The Office raised the same issues and additional legal issues during that conference. Because the parties were unable to agree on a schedule, the Commission continued the scheduling conference to October 4, 2012, to take argument on the record.

At the October 4, 2012 hearing, the Office argued several legal issues in support of its position that a schedule should be set for legal briefing prior to the filing of testimony. These issues included essentially the same issues that the Office now suggests should be the subject of post-hearing briefing. In response, the Division and Company argued that all of the Office’s issues were legal issues and should be addressed in pre-hearing briefs. They also provided brief responses to other arguments.

The parties agreed to a briefing schedule which would allow the Office and any other party opposing the Application on legal grounds to raise their issues in briefs to be filed on October 26, other parties to respond by November 7, the moving parties to reply by November

16, and a hearing on November 28, 2012. This was all to take place prior to the filing of testimony. The Commission adopted this schedule in its Scheduling Order issued October 16, 2012.

As discussed in the Division's Motion, on October 22, 2012, the Office informed the Commission that it was "electing not to file a dispositive motion allowed for by the Commission's October 16, 2012 Scheduling Order." The Office further stated that it would "address the utility rate and regulatory actions proposed by the application and contract at issue through the public hearing process and in testimony."

The Office proceeded in its direct testimony to raise the same type of issues regarding the Application. The Company responded in rebuttal testimony to these issues on regulatory policy grounds. In surrebuttal testimony, the Office responded that these were legal issues and recommended "that the only way for the Commission to rule on such issues is by accepting post-hearing briefs from all parties." OCS Exhibit 1SR lines 188-189. The Company believes this suggestion is inconsistent with the foregoing history.

While the Company is always willing to provide any information or argument the Commission believes is necessary for a decision, the Company believes the issues raised in the Office's direct testimony are principally questions of regulatory policy and have been adequately addressed in testimony. Therefore, the Company does not believe that this proceeding should be delayed further to require parties to file briefs.

Accordingly, the Motion should be granted.

Dated: January 29, 2013.

Respectfully submitted,

QUESTAR GAS COMPANY

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**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing **QUESTAR GAS COMPANY'S RESPONSE TO THE DIVISION OF PUBLIC UTILITIES' MOTION OPPOSING OFFICE OF CONSUMER SERVICES' BRIEFING REQUEST AND REQUEST FOR EXPEDITED TREATMENT AND SHORTENED RESPONSE TIME**

was served upon the following persons by email on January 29, 2013:

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