

Colleen Larkin Bell (5253)
Jenniffer Nelson Clark (7497)
333 S. State Street
PO Box 45433
Salt Lake City, Utah 84145-0433
(801)324-5556
(801)324-5935 (fax)
Colleen.Bell@questar.com
Jenniffer.Clark@questar.com

Attorneys for Questar Gas Company

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF QUESTAR GAS
COMPANY'S INTEGRATED
RESOURCE PLAN (IRP) FOR PLAN
YEAR: JUNE 1, 2013 TO MAY 31, 2014.

Docket No. 13-057-04

**SUPPLEMENTAL FILING
REGARDING LOST AND
UNACCOUNTED FOR GAS**

Pursuant to the Report and Order dated October 22, 2013 in the above-referenced docket (Order), Questar Gas Company (Questar Gas or Company) respectfully submits this Supplemental Filing Regarding Lost and Unaccounted For Gas. On page 14 of the Order, the Utah Public Service Commission (Commission) directed Questar Gas to “provide a supplemental filing in this docket explaining the increase in the [lost and unaccounted for] gas in the 2013 IRP” Accordingly, Questar Gas states as follows:

The volume of gas that is lost and unaccounted for (LAUF) is calculated by determining the amount of gas that was delivered to the city gate and comparing it to the amount that can be accounted for in Questar Gas' distribution system. The gas that can be accounted for in the Company's distribution includes sales and transportation to customers, gas used for company operations, and gas lost due to tearouts. The difference

between what was delivered at the city gate and what can be accounted for is considered to be LAUF gas.

By its very nature lost and unaccounted for is difficult to pinpoint exactly and determine. However, one change, in particular, contributed to the recent change. In the Company's 2009 general rate case (Docket No. 09-057-16), the Company proposed to change the methodology it uses to compensate for temperature and elevation. This change went into effect in August 2010. The Integrated Resource Plan (IRP) comparison includes data from the twelve-month period preceding August of 2010. To make a consistent year-to-year comparison, the Company estimated the effect of the temperature and elevation adjustment on the usage for each month of that period using adjustment factors derived from test data. The temperature adjustment depends upon the actual ambient temperature at the point and the time of consumption. Because the test data was derived from consumption at a different time period, the full effect of the temperature adjustment for the twelve-month period ending in July of 2010 could only be estimated using the test data factors. The consequent "estimation error" resulted in an artificially low estimate of the true LAUF gas amount.

It is important to also note that the Company estimates other factors of the LAUF calculation. The monthly sales consumption reported in the Company's financials includes an estimate because the meters are read at different points during the month. The Company also estimates the loss of gas due to tearouts. Though the sales data and the tearouts include estimates, they have both been using consistent estimating techniques through the reporting period, and should not be the cause for the increase.

Though the IRP report shows increasing amounts of LAUF gas, the Company recommends that the amounts be re-examined in the next IRP. In that report, data for 2009/2010 will no longer be in the three-year reporting period. Consistent methodology will then be used in all three years of compensating for temperature and elevation. This is expected to provide a more comparable year to year analysis.

DATED this _____ day of November, 2013.

Respectfully submitted,

QUESTAR GAS COMPANY

Colleen Larkin Bell (5253)
Jenniffer Nelson Clark (7947)
Attorneys for Questar Gas Company
333 S. State Street
PO Box 45433
Salt Lake City, Utah 84145-0433
(801) 324-5556

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Supplemental Filing Regarding Lost and Unaccounted For Gas was served upon the following persons by email on November ____, 2013:

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| <p>Chris Parker, Director Division of Public Utilities Heber Wells Building 4th Floor 160 East 300 South Salt Lake City, Utah 84111 chrisparker@utah.gov</p> | <p>Michele Beck Danny Martinez Utah Office of Consumer Services 160 East 300 South, Suite 200 PO Box 146782 Salt Lake City, UT 84114-6782 Telephone (801) 530-6480 mbeck@utah.gov dannymartinez@utah.gov</p> |
| <p>Patricia E. Schmid Justin Jetter Assistant Attorney General 160 East 300 South P.O. Box 140857 Salt Lake City, UT 84114-0857 pschmid@utah.gov jjetter@utah.gov</p> | <p>Brent Coleman Assistant Attorney General 160 East 300 South, 5th Floor P.O. Box 140857 Salt Lake City, Utah 84114-0857 brentcoleman@utah.gov</p> |