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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of the Application of Questar Gas Company to Increase Distribution Rates and Changes and Make Tariff Modifications</p>	<p>Docket No. 13-057-05 DIRECT TESTIMONY OF MICHAEL R. McGARVEY</p>
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October 30, 2013

24 approved interconnect point between the Company's distribution system and an
25 upstream pipeline to a redelivery meter serving customer's premises." Questar
26 Gas is now proposing to add the following at the end, "Each transportation
27 service customer must identify in the contract the interconnect/delivery point(s)
28 where it will deliver its natural gas supply into Questar Gas' system. Questar
29 Gas reserves the right, as provided herein, to require each transportation
30 customer to deliver its natural gas supplies to alternate interconnect/delivery
31 points, identified by Questar Gas Company when, in Questar Gas' sole
32 discretion, its operational or other needs support such a change."

33 I recommend the Utah Public Service Commission require Questar Gas to
34 provide justification by having the utility declare an Operation Flow Order for the
35 period of time applicable and discontinue natural gas service to all interruptible
36 service customers prior to imposing the requirement for Transportation Service
37 customers to use alternate interconnect/delivery points for their firm supply
38 delivery.

39 With regard to sub-section Upstream Capacity, Questar Gas is seeking to have
40 the Transportation Service Schedule customers provide or assist in the provision
41 of measurement information for volumes delivered to Questar Gas and other
42 unspecified information on a daily basis or agreed upon schedule. It is my
43 recommendation that the Utah Public service Commission not accept this sub-
44 section as proposed. In addition to the metering equipment Questar Gas already
45 owns and operates at its interconnects with the interstate pipelines providing
46 supply to their system, the information Questar Gas is seeking is already

47 provided via the nominations required by industry standards in order to provide
48 and schedule natural gas on a daily basis. I recommend the Utah Public Service
49 Commission require Questar Gas to clarify what specific information is required
50 beyond what is already necessary to perform natural gas deliveries to and within
51 their system.

52 SUMMARY

53 **Q. Please summarize why you believe the Commission should consider your**
54 **recommendations.**

55 A. I have examined the proposed changes Questar Gas is seeking for these
56 subsections and believe they are not consistent with industry practices as written.
57 I believe it is in the public's interest to require Questar Gas to justify and
58 necessitate the use of alternate interconnect/delivery points instead of its sole
59 discretion and provide greater transparency for any additional volume information
60 necessary to maintain the supply integrity of the Transportation Service
61 Schedule.

62 **Q. Does this conclude your prepared testimony?**

63 A. Yes

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 30th day of October, 2013, on the following:

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/s/

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