

May 19, 2015

Commissioner David Clark
Commissioner Thad Levar
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
P. O. Box 146751
Salt Lake City, UT 84114-6751

Re: Docket No. 13-057-18
(Compliance with the Report and Order in Docket No. 13-057-05
Infrastructure Rate Adjustment Mechanism Pilot Program)

Dear Commissioners:

Pursuant to the Report and Order approving Partial Settlement Stipulation in Docket No. 13-057-05 (Order), Questar Gas Company (Questar Gas or the Company) respectfully submits the following attachments:

Confidential Attachment 1: The High Pressure (HP) Feeder Line Master List (HP Master List)
Confidential Attachment 2: The current HP Feeder Line replacement schedule (HP Schedule)
Confidential Attachment 3: The intermediate high pressure (IHP) belt line Master List (IHP Master List)
Confidential Attachment 4: The current IHP belt line replacement schedule (IHP Schedule)

Paragraph 22 of the Partial Settlement Stipulation provides that, each year, the Company will provide an updated HP Master List, HP Schedule and IHP Master List. The updated HP Master List is attached as Confidential Attachment 1, the updated HP Schedule is attached as Confidential Attachment 2, and the updated IHP Master List is attached as Confidential Attachment 3. All of these documents are subject to change according to the terms and conditions set forth in the Order and the Partial Settlement Stipulation.

Paragraph 22 also requires the Company to explain any material changes to the HP Schedule and the IHP Schedule. There are no material changes in the project schedules for 2016 and beyond. Any changes to the 2015 construction schedule have been and will continue to be addressed in the quarterly variance reports that the Company files pursuant to Paragraph 22(c) of the Partial Settlement Stipulation.

Paragraph 21 of the Partial Settlement Stipulation in the above-referenced docket indicates that the Company will also provide additional information about the belt lines to be replaced in a form similar to that shown for the HP Schedule. Confidential Attachment 4 is the IHP Schedule and

shows the anticipated schedule of replacement at the current \$10 million annual investment amount. Questar Gas notes that this schedule will change over time according to the criteria set forth in Partial Settlement Stipulation Exhibit 5.

The attached documents are attached in both confidential and redacted format, for your convenience. The documents are submitted as a confidential documents pursuant to the Utah Public Service Commission's (Commission) Rules, Utah Admin. Code R746-100-16, and the Government Records Access and Management Act (GRAMA), Utah Code Ann. 63G-2-101 et seq.

Section 63G-2-305 of GRAMA protects certain records from disclosure. Specifically, it provides that, with some exceptions, a record is "protected" if the disclosure of the record "would identify real property . . . under consideration for public acquisition before any rights to the property are acquired. . . ." Utah Code Ann. 63G-2-305. The confidential portions of the referenced presentation set forth Questar Gas' prioritization for pipeline replacement. This data includes the locations of the pipelines identified to be replaced and the current prioritization for such replacement. Because such replacements often include property right acquisition for relocation and/or workspace, and because none of the enumerated exceptions to the above-referenced provision apply, disclosure of the geographic location and prioritization of these lines, together, should be considered protected pursuant to GRAMA.

Questar Gas Company respectfully provides this written claim of confidentiality and its reasons supporting that claim to the Commission, and respectfully requests that the Commission maintain these documents as confidential in accordance with the statutes and regulations referenced herein.

Pursuant to R746-100-3 and R746-100-16, I have also included non-confidential, redacted versions of each of the Attachments identified above.

If you or your staff has additional questions concerning these reports, please contact me.

Sincerely,

Barrie L. McKay
Vice President
Regulatory Affairs/Energy Efficiency

cc: Division of Public Utilities
Office of Consumer Services