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Date Submitted: September 17, 2013

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE FORMAL)	DOCKET NO. 13-057-06
COMPLAINT OF JOHN ASSON)	ANSWER OF QUESTAR GAS
AGAINST QUESTAR)	COMPANY AND MOTION
GAS COMPANY)	TO DISMISS

Respondent Questar Gas Company (“Questar Gas” or “Company”) respectfully answers the Formal Complaint filed by John Asson (“Mr. Asson”) with the Public Service Commission of Utah (“Commission”) on Aug. 29, 2013. Questar Gas moves that the Complaint be dismissed in that Questar Gas has acted in compliance with all applicable federal, state, tariff, and Commission requirements, and Mr. Asson presented no claim for which relief may be granted.

ANSWER

1. According to Company records, on or around Feb. 8, 2001, Questar Gas began providing natural gas service to Mr. Asson at [REDACTED] (“Asson Residence”). Questar Gas has continuously provided natural gas service to the Asson Residence since that date. According to Company records, Mr. Asson’s account is billed in accordance with a monthly budget plan, allowing a predetermined monthly payment to spread the cost of gas service evenly over the year.

Meter Repairs and Billing Adjustment

2. According to Company records, on or around Jan. 15, 2013, the meter at the Asson Residence was read during the Company's regular monthly meter reading process, reporting a meter read of 9191. On or around Jan. 15, 2013, the Company issued a billing statement for the Asson Residence through the standard procedures for the Company.

3. According to Company records, on or around Feb. 14, 2013, the meter at the Asson Residence was once again read during the Company's regular monthly meter reading process; however, at this time, the meter reported an identical meter read of 9191, indicating a non-registering meter, meaning the meter continued to provide gas service, but was not recording the measurement of the gas being provided.

4. Under Section 8.01 of the Questar Gas Utah Natural Gas Tariff, PSCU 400 ("Tariff"), "[i]f the Company's meter fails to register at any time, the gas delivered or used by the customer during such failure, in the absence of a more accurate basis, may be determined using consumption from the customer's nearest corresponding equal period of usage at the premises when there was no such failure." Moreover, under Section 8.02, in the event that the non-registering meter causes a billing error, "the Company will have the right to make billing corrections regardless of the cause of error," limited to a 3-month period for non-registering meters.

5. Upon receiving the identical meter read in Feb. 2013, the Company determined that the unusually low usage of the Asson Residence billed on the Jan. 15, 2013 billing statement indicated the meter failed to register at some point between the meter reads conducted in Dec. 2012 and Jan 2013.

6. Therefore, according to Company records, on or around Feb. 15, 2013, Questar Gas's billing department re-calculated the Jan. 2013 usage based on the 2012 usage and adjusted to the current year's actual temperatures. Questar Gas, then, billed \$168.29 to the account for the Asson Residence, while crediting the \$51.40 originally billed back to the account for the Asson Residence. Likewise, Questar Gas calculated the Feb. 2013 usage based on the Feb. 2012 measurements and billed \$155.18 to the account. An itemization of the account for the Asson Residence is attached as **Exhibit "A."** The Feb. billing statement for the account to the Asson Residence then provided notice to the account holder of the non-registering meter, though due to the budget plan billing, the statement was unable to show a line-item explanation of the recalculated amount for the Jan. billing. However, the recalculated amounts were reflected in the Budget Plan Balance on the Feb. billing statement. A copy of the Feb. 15, 2013 billing statement is attached as **Exhibit "B."**

7. Upon identification of a non-registering meter, and pursuant to Company policy, Questar Gas's billing department issued a field order for a technician to inspect the meter at the Asson Residence and investigate the cause of the error.

8. According to Company records, on or around March 12, 2013, a Questar Gas technician visited the Asson Residence and determined the meter on the Asson Residence had a broken wiggler. The wiggler is a part of the transponder, which is essential to the measurement of the gas flowing through the meter by turning the drive shaft in the transponder. When the wiggler breaks, natural gas continues to flow through the meter with no detriment to gas service. However, it causes the numbered dials on the index and the computer readings on the transponder to cease advancing, thereby failing to indicate the amount of gas consumed. The

Questar Gas technician replaced the index and the transponder connected to the meter at the Asson Residence.

9. Therefore, while the billing of Mr. Asson's account required calculations of usage based on the 2012 measurements, the flow of gas through the meter was not affected at any point due to the damage to the wiggler.

10. On or around March 4, 2013, Mr. Asson contacted Questar Gas with concerns that the meter on the Asson Residence may have caused inaccuracies in the subsequent meter reads. Mr. Asson discussed his concerns with the Questar Gas Ask-a-Tech department and scheduled a Home Energy Audit.

11. In response to Mr. Asson's continued concerns, according to Company records, on or around Sep. 10, 2013, Questar Gas sent a technician to the Asson Residence to inspect the meter and transponder. During that inspection, the Questar Gas technician verified that both the meter and the transponder at the Asson Residence were functioning properly and found no issues with the installed equipment.

12. Moreover, according to Company records, the Asson Residence's usage measurements following the repair to the meter show usage amounts similar to the historical consumption provided to the Asson Residence.

13. While the actual measurements billed between Apr. and Aug. 2013 show a total consumption of 204 CCF of natural gas, Questar Gas records confirmed a comparable history of gas consumption for that period. From 2008 through 2012, Mr. Asson consumed an average of 243.6 CCF during the Apr. to Aug. timeframe— 39.6 CCF greater than the amount consumed in 2013. Specifically, Mr. Asson's account shows the following gas usage:

Billing Time Period	Total Gas Consumed during Time Period
Apr. to Aug. 2012	181 CCF
Apr. to Aug. 2011	246 CCF
Apr. to Aug. 2010	246 CCF
Apr. to Aug. 2009	257 CCF
Apr. to Aug. 2008	288 CCF
5-yr Average of Gas Consumption from Apr. to Aug	243.6 CCF

Adjustment to Budget Plan Predetermined Monthly Amount

14. In addition to the repair, Mr. Asson indicated to Questar Gas his concern that the Aug. 2013 increase to his budget plan predetermined monthly amount may be indicative of inaccurate billing amounts. Questar Gas conducted a review of the budget plan of account for the Asson Residence and found the increase within the typical range of the account.

15. Pursuant to Section 8.05 of the Questar Gas Tariff, “[t]o spread gas bill amounts evenly over the entire year, General Service customers may elect to utilize the Budget Plan and pay a predetermined monthly amount.” The Tariff further provides, “The monthly budget plan payment amounts may be adjusted by the Company during the year if actual and accrued billings deviate substantially or if a rate change of 5% or greater is approved.”

16. According to Company records, on or around Aug. 1, 2013, the Company adjusted Mr. Asson’s account based on the actual and accrued billings to the account. This adjustment to the predetermined monthly amount resulted in a change from \$59.00 to \$73.00, for a monthly increase of \$14.00; however, Questar Gas records confirmed that, the adjusted amount of \$73.00 remains below an average adjusted payment amount of \$82.08.

17. After a Questar Gas review of the adjustments from June 1, 2007 through present, Mr. Asson's account has shown a history of similar budget plan adjustments, with the last twelve adjustments ranging from a low of \$59.00 per month to a high of \$104.00 per month.

Specifically, the history of the account shows the following adjustments:

Date of Adjustment	Resulting Predetermined Payment Amount:
Aug. 1, 2013	\$73.00
Jul. 1, 2012	\$59.00
Jul. 1, 2011	\$73.00
Aug. 1, 2010	\$59.00
Jul. 31, 2010	\$94.00
Jul. 15, 2009	\$88.00
Jun. 1, 2009	\$93.00
Feb. 28, 2009	\$78.00
Jun. 30, 2008	\$93.00
Jun. 1, 2008	\$76.00
Oct. 31, 2007	\$95.00
Jun. 1, 2007	\$104.00
Average Payment Amount:	\$82.08

18. Likewise, Questar Gas records confirmed that the Company has adjusted the predetermined monthly amount of Mr. Asson's account at least once each summer for the last seven years in the ordinary course of business.

19. Questar Gas has not violated any of its tariff provisions or Commission rules in providing natural gas service to Mr. Asson or issuing bills for such service.

MOTION TO DISMISS

As shown in the Answer above, Questar Gas acted in accordance with the Tariff upon identifying a non-registering meter at the Asson Residence. Questar Gas calculated the affected periods in accordance with the Tariff and based on the previous year's usage at the Asson

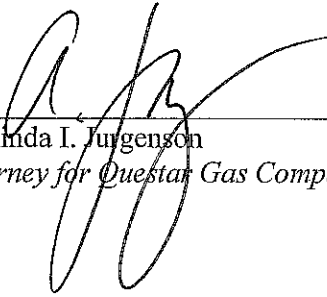
Residence. Following the replacement of the index and transponder, Mr. Asson's account showed consumption comparable to the history of the account. Moreover, the adjustment to the monthly predetermined amount for Mr. Asson's budget plan occurred in the ordinary course of business.

Questar Gas has, therefore, established that it has acted in accordance with Tariff requirements and Commission rules with respect to the non-registering meter on the Asson Residence and billing adjustments made to Mr. Asson's account for natural gas service to the Asson Residence. Questar Gas respectfully requests that the complaint of Mr. Asson be dismissed because it fails to state a claim upon which relief can be granted.

WHEREFORE, Questar Gas Company submits its Answer and respectfully moves that the Formal Complaint of John Asson be dismissed.

Dated this 17th day of September, 2013.

Respectfully Submitted



Arminda I. Jurgenson
Attorney for Questar Gas Company

CERTIFICATE OF MAILING

I certify that I mailed a true and correct copy of the foregoing Answer and Motion to
Dismiss on September 17, 2013, to:

John Asson



A handwritten signature in black ink, appearing to be 'John Asson', written over a horizontal line.



CUSTOMER ACCOUNT ITEMIZATION

ITM

NAME John D Asson (REGULAR BILLING)	DATE September 13, 2013	PREPARED BY Elia (801) 324-3557
SERVICE ADDRESS [REDACTED]	ACCOUNT NO. [REDACTED]	TURN ON DATE February 8, 2001
MAILING ADDRESS [REDACTED]	METER NO. [REDACTED]	SHUT OFF DATE [REDACTED]

Usage Information			Billing Information				Transaction Information				
Service To Date	Meter Read	* Usage	Gas Service	Int	Previous Balance	+ Misc.	Total Bill	Date	Payments / Adjustments		Balance
	CF	DTH							-	+	
12/13/2012			\$97.29		-\$235.98		-\$138.69	1/4/2013	\$59.00		-\$197.69
1/15/2013			\$51.40		-\$197.69		-\$146.29	2/4/2013	\$59.00		-\$205.29
2/15/2013			\$168.29		-\$205.29		-\$37.00	2/15/2013		-\$51.40	-\$88.40
2/15/2013			\$155.18		-\$88.40		\$66.78	3/4/2013	\$59.00		\$7.78
3/14/2013			\$105.60		\$7.78		\$113.38	4/4/2013	\$59.00		\$54.38
4/12/2013			\$53.87		\$54.38		\$108.25				

REMARKS:

* R=Read, C=Calculation, P=Post Card, X=Meter Change, F=Final Bill
 ** Misc CF=Connection Fee, CK=Returned Check Fee, SD=Security Deposit, MS=Meter Seal, MP=Meter Plug, DM=Damaged Meter
 *** See adjustment explanation under remarks

EXHIBIT A

John D Asson

Account: [REDACTED]

Thank you for your patronage. Your prompt payment assists us in providing our customers with high-quality natural gas service.

Account Summary as of: January 15, 2013

Previous Balance Due - 01/04/2013	59.00
Payment Received - 1/4/2013	-59.00
Current Charges - Gas Service (Budget)	59.00
Total Amount Due Upon Receipt	\$ 59.00

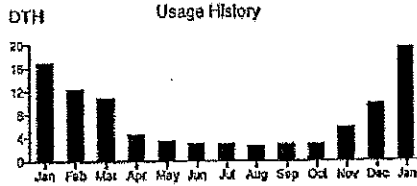
1% monthly interest (12% annually) charged on balance on or after 02/06/2013.

Service Address: [REDACTED] 0.000000 0.000000 0.000000 0.000000

Residential Gas Service

Service Agreement: 3263360013

Comparison	Last Year	This Year
Decatherms/Day	0.53	0.60
Dollars/Day	\$4.60	\$5.26



Service from 12/14/2012 - 1/15/2013

Rate - GS

Charge for Gas Used (Avg cost per DTH \$ (7.70185))	41.59
Basic Service Fee Total	5.00
Utah Sales Tax (4.15%)	1.93
Municipal Energy Tax (6%)(Salt Lake City)	2.80
Energy Assistance	0.08
Current Gas Billing	51.40
Current Charge (Budget Amount)	\$ 59.00

(Budget Plan Balance: \$146.29 Credit)

Meter ID	Current Meter Read		Previous Meter Read		Days	Dial Difference	Volume Multiplier	Billed DTH
	Date	Reading	Date	Reading				
36022680	1/15/2013	9191	12/13/2012	9136	33	55 CCF	0.097603	5.4

Questions, comments or mailing address corrections?
 Call Questar Gas weekdays 7am-6pm (see back of page for details) or visit our website: Questargas.com

Please write your account number on your check and return this portion with your payment.



Account	Current Charges Past Due After	Total Amount Due	Amount Enclosed
[REDACTED]	2/6/2013	\$59.00	

Questar Gas Company
 PO Box 45841
 Salt Lake City, UT 84139-0001

John D Asson
 [REDACTED]

Sign me up for a monthly REACH donation of: \$ _____