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- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

)	
)	Docket No. 14-057-15
In the Matter of the Questar Gas)	
Company's Integrated Resource Plan for)	REPLY COMMENTS
Plan Year: June 1, 2014 to May 31, 2015)	
)	
)	

Comments to the Company's 2014 Integrated Resource Plan (IRP) were filed on August 13, 2014 by the Utah Division of Public Utilities (Division) and the Office of Consumer Services (Office). The Company respectfully submits these reply comments.

REPLY TO THE COMMENTS OF THE DIVISION OF PUBLIC UTILITIES

In its comments, the Division concludes that "the Company has made reasonable attempts to satisfy the 2009 IRP guidelines and has also committed, through continuing discussions with parties, to continue to improve on details of some aspects presented in this IRP." The Company concurs with this conclusion and will continue to incorporate comments and suggestions to the IRP process to improve the process and satisfy the 2009 IRP guidelines.

REPLY TO THE COMMENTS OF THE OFFICE OF CONSUMER SERVICES

In its comments the Office provides six recommendations for consideration by the Commission. The Company responds to these recommendations as follows:

The first recommendation indicates that with regard to future Integrated Resource Plan's (IRP), "the Company should be required to indicate the impact, if any, of DSM programs on peak day usage." The Company will continue to report, in future IRPs, on peak day issues. The Company is willing to comply with the recommendation of the Office and will report on the impact of DSM programs on peak day usage, as required by the Commission.

Second, the Office recommends that "Inspection results from TIMP and DIMP activities should be included either as an appendix, as part of the System Capabilities and Constraints section of the IRP, or cited to where the information can be found." The Company will provide the information or provide a reference to the Transmission Integrity Management Plan (TIMP) and Distribution Integrity Management Plan (DIMP) inspection reports in future IRPs.

Third, the Office recommends that "The Company should provide actual annual expenditures for the Transmission and Distribution Integrity Management Plans." The Company has recently begun to provide the Utah Public Service Commission (Commission) with the requested information relating to TIMP and DIMP expenditures, with a copy provided to the Division and the Office. The Company is willing to continue to provide this information to the Office.

Fourth, the Office recommends that "The Company should explicitly show the [cost of service] COS gas production percentage calculation in the COS Gas Production section of the IRP and show clearly how the annual forecasted demand is derived to comply with the

stipulated 65% level of COS gas from Docket No. 13-057-13.” The Company agrees that, starting with the 2015 IRP, this calculation, as spelled out in the Stipulation, will become increasingly important. The Company will comply with this recommendation and will begin to provide the requested information in the 2015 IRP, and will do so going forward.

Fifth, the Office recommends that “The Company should expand upon the section on COS gas shut-ins as described in our comments above.” The Company observes that the information pertaining to COS gas shut-ins is contained in the quarterly variance reports currently provided to the Commission, the Office and the Division. The Company will also provide this information in future IRPs.

Finally, the Office recommends that “the Company, the Division, and the Office should confer prior to the filing of the next IRP to seek a shared understanding of the correct calculation to be used in determining the annual demand forecast, which is key to the gas management plan agreed to in the Trail Unit stipulation.” The Company agrees and will provide a detailed explanation of the annual demand forecast used for the gas management plan agreed to in the Trail Unit stipulation in a 2015 public IRP meeting.

CONCLUSION

The Company will continue to work with the Division and Office and other interested parties to improve its IRP process. If the Commission or Parties believe that additional

technical conferences would be helpful to further discuss these topics, the Company would be available to participate.

Dated this _____ day of September, 2014.

Respectfully submitted,

QUESTAR GAS COMPANY

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CERTIFICATE OF SERVICE

This is to certify that a copy of Questar Gas Company's Reply Comments, in Docket No. 14-057-15, was sent by electronic mail on September _____, 2014, to the following:

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