

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Formal)	
Complaint against Questar)	
Gas Company Regarding)	Docket 14-057-19
Nomination Procedures and)	
Practices for Transportation)	
Service Customers)	

REBUTTAL TESTIMONY OF

GAVIN MANGELSON

FOR THE

OFFICE OF CONSUMER SERVICES

SEPTEMBER 10, 2014

1 **Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS**
2 **ADDRESS?**

3 A. My name is Gavin Mangelson. I am a Utility Analyst for the Office of
4 Consumer Services (Office). My business address is 160 East 300 South
5 Salt Lake City, Utah 84111.

6 **Q. ARE YOU THE SAME PERSON WHO FILED DIRECT TESTIMONY FOR**
7 **THE OFFICE OF CONSUMER SERVICES?**

8 A. Yes, I filed Direct Testimony for the Office of Consumer Services on August
9 28, 2014.

10 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

11 A. The purpose of this testimony is to respond to certain aspects of the direct
12 testimony of Will Schwarzenbach and Tina Faust.

13 **Q. DOES MR. SCHWARZENBACH PRESENT AN ALTERNATE SOLUTION**
14 **TO ACHIEVE THE BENEFITS SOUGHT BY THE COMPLAINANTS?**

15 A. Yes. In lines 87-89 of Mr. Schwarzenbach's testimony he states that gas
16 marketers or agents can utilize a transportation contract on Questar
17 Pipeline to aggregate their gas supplies and thereby achieve the benefits
18 they seek without the use of a formal pooling arrangement on the Questar
19 Gas side of the City Gate.

20 **Q. HOW DOES THE USE OF A TRANSPORTATION CONTRACT RELATE**
21 **TO THE OFFICE'S POSITION AND YOUR TESTIMONY?**

22 A. The Office's primary concern is that a change to Questar Gas' tariff may
23 result in costs or risks shifting to other general service classes; whether they

24 are foreseen or unforeseen. Mr. Schwarzenbach has proposed an alternate
25 solution that he maintains will achieve the benefits sought by the
26 Complainants without shifting any costs or risks to other general service
27 classes.

28 **Q. IS THE OFFICE TAKING THE POSITION THAT TRANSPORTATION**
29 **CONTRACTS ON QUESTAR PIPELINE WOULD RESOLVE THE**
30 **CONCERNS OF THE COMPLAINANTS?**

31 A. No, the Office will need to review any evidence and responses to Mr.
32 Schwarzenbach's testimony prior to taking a definitive position.

33 **Q. MS. FAUST ARGUES THAT A FORMAL POOLING ARRANGEMENT**
34 **WOULD LIKELY RESULT IN ADDITIONAL COSTS. (SEE FAUST**
35 **DIRECT LINES 135 – 138) WHAT IS YOUR RESPONSE?**

36 A. To the extent that formal pooling creates costs then these costs need to be
37 identified and included in any future pooling tariff. If Questar specifically
38 identifies costs or risks that a pooling tariff would cause to be shifted to other
39 general service customers, then the Office would oppose the
40 implementation of such a tariff.

41 **Q. DOES THAT CONCLUDE YOUR REBUTTAL TESTIMONY?**

42 A. Yes it does.