

Gary A. Dodge, #0897
HATCH, JAMES & DODGE
10 West Broadway, Suite 400
Salt Lake City, UT 84101
Telephone: 801-363-6363
Facsimile: 801-363-6666
Email: gdodge@hjdllaw.com
Attorneys for Continuum Retail
Energy Services, LLC

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

| | |
|--|---|
| <p>In the Matter of the Application of Questar Gas Company to Make Tariff Modifications to Charge Transportation Customers for use of Supplier-Non-Gas Services</p> | <p>Docket No. 14-057-31</p> <p>PETITION TO INTERVENE LATE OF CONTINUUM RETAIL ENERGY SERVICES LLC</p> |
|--|---|

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Petitioner Continuum Retail Energy Services LLC (“Petitioner”) hereby petitions for leave to intervene late in this docket.

In support of this petition, Petitioner states as follows:

1. Petitioner is a gas supplier to several Utah companies who transport natural gas under Questar Gas Company’s TS tariff.
2. The legal rights and interests of Petitioner and its customers will be substantially affected by this proceeding.
3. The scheduling order in this docket sets a deadline for intervention of May 5, 2015. Petitioner did not intervene by that date because of internal personnel issues and changes that caused it to lose track of the intervention deadline. Petitioner was reminded of the intervention

deadline when it received copies of direct testimony filed by other gas suppliers and Questar Gas transportation customers. Petitioner recognizes that its direct testimony deadline has passed and it does not intend to file direct testimony in this matter.

4. Petitioner respectfully submits that it has just cause for intervening late in this proceeding, as indicated above. Moreover, the deadline for filing direct testimony by the Division of Public Utilities and the Office of Consumer Services, July 2, 2015, has not yet passed. Petitioner respectfully submits that its late intervention will not cause harm or prejudice to any party. Petitioner accepts the existing schedule and will not request or cause any schedule delays.

5. Petitioner has not fully determined the specific positions it will take or the relief it will seek. Petitioner seeks to intervene for purposes of protecting its interests and the interests of its customers as they may appear.

6. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired if Petitioner is allowed to intervene.

7. Notices in this proceeding should be sent to the following:

Gary A. Dodge
HATCH, JAMES & DODGE
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
Telephone: 801-363-6363
Facsimile: 801-363-6666
Email: gdodge@hjdllaw.com

James Morin
Director C&I West Region
Continuum Retail Energy Services LLC
Telephone: 720-214-5820
Email: jmorin@ContinuumES.com

WHEREFORE, Petitioner requests leave to intervene late in this proceeding to protect its interests as they may appear.

DATED this 14th day of May 2015.

HATCH, JAMES & DODGE

/s/ _____

Gary A. Dodge

Attorneys for Continuum Retail Energy Services LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 14th day of May 2015 on the following:

Questar Gas Company:

| | |
|-----------------------|------------------------------|
| Colleen Larkin Bell | colleen.bell@questar.com |
| Jennifer Nelson Clark | jennifer.clark@questar.com |
| Barrie McKay | barrie.mckay@questar.com |
| Kelly Mendenhall | kelly.mendenhall@questar.com |

Division of Public Utilities:

| | |
|-----------------|----------------------|
| Patricia Schmid | pschmid@utah.gov |
| Justin Jetter | jjetter@utah.gov |
| Chris Parker | chrisparker@utah.gov |
| Artie Powell | wpowell@utah.gov |

Office of Consumer Services:

| | |
|----------------|------------------------|
| Rex Olsen | rolsen@utah.gov |
| Michele Beck | mbeck@utah.gov |
| Danny Martinez | dannymartinez@utah.gov |

UAE:

| | |
|---------------|---------------------------|
| Gary Dodge | gdodge@hjdlaw.com |
| Kevin Higgins | khiggins@energystrat.com |
| Neal Townsend | ntownsend@energystrat.com |
| Jeff Fishman | jfishman@energystrat.com |

Summit Energy:

| | |
|-------------------|------------------------------|
| Larry R. Williams | larry@thesummitcompanies.com |
| Mike McGarvey | mike@summitcorp.net |

Nucor Steel:

| | |
|---------------------|--------------------|
| Damon E. Xenopoulos | dex@bbrslaw.com |
| Jeremy R. Cook | jrc@pkhlawyers.com |

Kroger:

| | |
|--------------------|--------------------------|
| Kurt J. Boehm | kboehm@BKLawfirm.com |
| Jody Kyler Cohn | jkylercohn@BKLawfirm.com |
| Richard A. Baudino | rbaudino@jkenn.com |

CIMA:

| | |
|-------------|---------------------|
| Matt Medura | mjm@cima-energy.com |
|-------------|---------------------|

US Magnesium:

| | |
|---------------|---------------------------|
| Roger Swenson | roger.swenson@prodigy.net |
|---------------|---------------------------|

Continuum:

| | |
|-------------|------------------------|
| James Morin | jmorin@ContinuumES.com |
|-------------|------------------------|

/s/ _____