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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of of Questar Gas Company's Filing to Comply with the Commission Order Issued on November 9, 2015 in Docket No. 14-057-31, Application of Questar Gas Company to Make Tariff Modifications to Charge Transportation Customers for Use of Supplier-Non-Gas Service	Docket No. 15-057-T06 SUMMIT ENERGY, LLC COMMENT TO PROPOSED TARIFF MODIFICATION
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Summit Energy, LLC ("Summit"), by and through its attorney, Larry R. Williams, hereby submits the following comments to the Tariff modification language proposed by Questar Gas Company ("QGC") pursuant to the Commission Order issued November 9, 2015 in docket No. 14-057-31 (the "Order").

INTRODUCTION

The Order authorized QGC to implement an imbalance charge of \$0.08896 per Dth to be applied to daily volumes received by Transportation Customers outside of a

five percent (5%) tolerance. The Commission ordered QGC to file revised tariff sheets to include this charge and propose an effective date in accordance with the findings of the Order. The Order also required QGC to file updates to the charge in the next 191 account pass-through application.

The stated purpose of the Order is twofold. The primary purpose of the Order is to be an incentive to the Transportation Customers to make more accurate nominations to ensure system reliability. (Order, Page 28, Lines 19-20) The position of QGC in the matter was that the integrity of their distribution system and their ability to deliver gas to their customers is threatened unless the Transportation Customer makes accurate nominations. Testimony at the hearing recognized that if the nominations of the Transportation Customers are sufficiently managed so that no daily imbalance tolerances are exceeded, the daily imbalance management cost currently incurred by QGC would not be reduced and that full cost would all be allocated solely to the Sales Customer.

The Order is also a cost allocation solution, not a revenue generating proposition. The Commission did find that it is reasonable to allocate a portion of the daily imbalance management costs to a Transportation Customer when that Transportation Customer's nominations are outside of its daily imbalance tolerance window. (Order, Page 28, Lines 5-8)

On November 23, 2015 QGC filed the tariff modification language ("Proposed Tariff Modification") intended to embody the findings and decisions outlined in the Order. Upon review of the Proposed Tariff Modification Summit makes the following comments based on the review of the language contained therein.

COMMENT #1 – PROPOSED EFFECTIVE DATE

The Order required that the tariff modification contain a proposed effective date. The Proposed Tariff Modification identified an effective date of February 1, 2016 for QGC to impose the charge of imbalances outside the daily tolerance amount. Summit requests that, while it is appropriate for QGC to begin to provide the information regarding daily imbalances that it wishes to include on its invoices relating to this new charge beginning on February 1, 2016, the actual effective date for the charges should begin on May 1, 2016.

This will give both QGC and the Transportation Customer ninety (90) days, or three (3) billing cycles to assess this new accounting process. Historically, monitoring actual usage information has been by accomplished and reported on a monthly basis by the Transportation Customer with monitoring and adjustment procedures being aligned to that type of usage accounting. The Order changes this paradigm, now requiring imbalance reconciliation on a purely daily basis. Transportation Customers need time to adjust their method of calculating and monitoring of their usage and put into place systems to more timely respond to the daily amounts being used. In addition, a few billing cycles are needed to assure that both QGC and the Transportation Customer are acquiring the same volume recordings and that any discrepancies can be resolved before actual charges for imbalance accrues. Finally, the Transportation Customer needs time to acquire and install updated equipment to more accurately monitor daily usage if finds that its current monitoring practices are inadequate it. Summit asks that the Commission require QGC to begin providing imbalance information on its invoice regarding this new charge beginning February 1, 2016, but delay the actual charge for

imbalances outside of tolerance levels until May 1, 2016. Such a requirement will provide fairness and equity to the Transportation Customer while meeting the primary objective of the Order by incenting the Transportation Customer to make more accurate nominations.

COMMENT #2 – SMALL CUSTOMER PROTECTION

The Order recognized that it was reasonable to require an accommodation in the billing for Small Customers, since nomination systems are limited to whole numbers. (Order Page 36, Lines 2-5) QGC indicated that its billing system would accommodate rounding. The Order determined that rounding for billing purposes was reasonable and will provide some protection to the small Transportation Customer. A provision should be included in the tolerance language that addresses this protection to the Small Customer.

CONCLUSION

Summit requests that the Commission require a 90 day roll out period be included in the tariff language and that the tariff include a provision for rounding to address the Small Transportation Customers as directed in the Order.

DATED this 8th day of December, 2015.

/s/

Larry R. Williams
Counsel for Summit Energy, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 8th day of December, 2015, on the following:

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