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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rule-Making for Rule Provisions Delineating “Complete” Application Requirements for Rate Case and Major Plant Addition Applications Pursuant to Utah Code Sections 54-7-12 and 54-7-13.4	Docket No. 09-999-08 PRELIMINARY COMMENTS AND SUGGESTIONS OF QUESTAR GAS COMPANY ON SB 75 RULES
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Questar Gas Company (Questar Gas) respectfully provides these preliminary comments and suggestions on rules to be adopted by the Commission under Senate Bill 75 (SB 75) enacted by the Utah Legislature during the 2009 General Session. These preliminary comments and suggestions are provided pursuant to the Pre-Rulemaking Schedule issued by the Commission in this docket on May 4, 2009.

I. COMMENTS AND SUGGESTIONS ON RULES

A. General Rate Case “Complete Filing” Requirements

SB 75 was the result of a collaborative effort to amend and clarify Utah Code Section 54-7-12. In particular, SB 75 provided that the 240-day time period for completing a rate case commences when a “complete filing” is made. “Complete Filing” is defined by SB 75 as “an application filed by a public utility that substantially complies with minimum filing requirements established by the commission.” Questar Gas believes that a complete filing includes the

utility's application for rate relief, accompanied by pre-filed testimony to support its request and its proposed rate schedules. Additionally, as a result of a task force created in response to the "test period" amendment to Utah Code Ann Section 54-4-4(3) in 2003 Questar Gas voluntarily agreed to file data requested by parties in the task force. These data requests were called Master Data Request A and Master Data Request B. Responses to Master Data Request A were filed simultaneously with the general rate case application followed by responses to Master Data Request B which were filed 30 days after the filing. Questar Gas believes that this process worked well for its 2007 general rate case filing in Docket No. 07-057-13. Questar Gas has since modified Master Data Request A and B based on feedback from the Division of Public Utilities. Attachment 1 illustrates Questar Gas's proposal and identifies information that would be filed with an Application in a general rate case, as well as information that would be filed 30 days after the general rate case filing.

B. Test Period Determination.

Questar Gas believes that providing the data and information described above at the time of its general rate case filing would not only meet "complete filing" requirements but would allow other parties an opportunity to determine whether the Company's proposed test period is appropriate or whether a party would like to propose a different test period. The Company believes that the test period determination must be completed within the 240 day time period. If adjustments are required to be made to the revenue requirement as a result of the final test period determination, updates to the revenue requirement should be made within a reasonable time after the test period determination. Such updates should not serve as a basis for which re-start the 240 day clock.

C. Bifurcation of Cost Allocation and Rate Design

The Company believes it is worthwhile for the Commission to retain the discretion to bifurcate the issues of cost allocation and rate design. The Company further believes that the 240-day limit refers only to the revenue requirement determination and rate effective date. In the event the Commission determines that bifurcation of cost allocation and rate design will facilitate the complete examination of those issues, the 240-day limit need not apply to the final spread and design phase of the general rate case.

D. Major Plant Addition Cases

SB 75 also amended Utah Code Section 54-7-12 to include a provision for utilities to request cost recovery of major plant addition if the Commission has entered a final order in a general rate case proceeding within 18 months of the projected in-service date of a major plant addition. Questar Gas believes that the filing requirements to support a single item rate case for major plant addition should include an application supported by testimony and specific cost information to support the major plant addition and a proposed rate schedule. Since a filing for major plant addition must occur in near proximity to the Company's most recently filed general rate case, the Company does not believe it is necessary to file the same kinds of data that would otherwise be filed with a general rate case application.

II. CONCLUSION

One of the purposes of Senate Bill 75 was to clarify that the 240 day time period commences when the utility has made a complete filing for a request for rate relief under either a general rate case or a major plant addition case. In adopting rules regarding what constitutes a "complete filing" under Senate Bill 75, Questar Gas respectfully suggests that the Commission consider adopting the modified data requests as shown in Attachment 1 and clarify that the

application supported by testimony and proposed rate schedules constitutes a “complete filing” and that a determination of the test period must be done within the 240 day time period.

DATED: May 18, 2009.

Respectfully submitted,

QUESTAR GAS COMPANY

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **PRELIMINARY COMMENTS AND SUGGESTIONS OF QUESTAR GAS COMPANY ON SB 75 RULES** to be served upon the following by electronic mail to the addresses shown below on May 18, 2009:

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