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- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

In the Matter of the Request of the Division of Public Utilities for Enforcement Action Under the Natural Gas Pipeline Safety Act against Questar Gas Company)))))	Docket No. 07-057-04 Docket No. 14-999-02
In the Matter of the Miscellaneous Correspondence and Reports Regarding Gas Utility Services; 2014))))	REPLY COMMENTS

On July 11, 2014 the Division of Public Utilities (Division) filed its action request response in Docket 14-999-02, Questar Confidential Semi-Annual Training Report. On August 18, 2014, The Public Service Commission of Utah (Commission) filed its order on safety training reporting and requested that Questar Gas Company (Company) file additional information. This report provides the additional information requested by the Commission.

DISCUSSION

In its order, the Commission provides five issues that require clarification. The Company responds to the issues as follows:

The first issue raised by the Commission is concerned with “several areas in which Questar failed to fulfill Stipulation requirements or took longer than the Division expected to fulfill certain conditions.” The Division indicated that Questar Gas was “not in

compliance” with the requirement to file reports within 60 days of June 30th and December 31st. The Company agrees that it did not file reports for the second half of 2009, or during 2010 and 2011, though the data for those reporting periods was provided in a response to a data request in 2014. This information shows that though the reports were not filed, the Company did continue to train its employees in pertinent safety issues. Since 2012, the Company has improved coordination between its Regulatory and Operations groups to ensure that the report is submitted in a timely fashion.

Second the Commission directed the Company to explain the difference between safety training and safety awareness. The Company agrees there is a difference between training and awareness. Both are important in an overall safety plan. The monthly safety training meetings are mandatory meetings where employees discuss relevant topics and the Company tracks attendance. The Company requires formal classroom training to maintain certifications and tracks attendance at these meetings also. These safety trainings demonstrate compliance with DOT requirements, OSHA training, and any other required safety training. If necessary, the Company could query a database and report training by individual employee. However, the Company believes that summarizing the hours is sufficient to meet the requirements of the Order Approving Settlement Stipulation in Docket No. 07-057-04 (Order).

Other meetings, such as daily tailgate meetings, the workers observing workers (WOW) program, safety fairs, and weekly safety meetings are less formal and are meant to raise safety awareness. Because these programs are informal the Company reports them as averages.

The Commission directed the Company to address a third issue: errors in calculating the total training hours in the report dated January 21, 2014. The Company’s

original report contained a calculation error. The table below explains how the hours of training in the report add up to 85,557 hours.

Man hours conducting training	7,084
Training ELM employees	156
Training hours donated to blue stakes and Utah Pipeline Association	120
Daily tailgate meetings	34,743
One-on-one training	14,890
Monthly safety meetings	13,080
Formal classroom training hours	10,034
Safety Fairs	3,270
Workers observing workers (WOW) program	2,180
Total Hours	<u>85,557</u>

The Company filed a corrected report concurrently with these comments. A copy of the report is attached.

The Commission directed Questar Gas to address a fourth issue involving a perceived contradiction between the requirements of 49 C.F.R. 192.605(a) (CFR), and the Company's statement that, "Questar Gas is required by the Department of Transportation to review its operating procedures once every three years." The CFR requires a procedural manual for operations, maintenance, and emergencies to be reviewed and updated by a pipeline operator at intervals not exceeding 15 months, but at least once each calendar year. The subject manual is known as the Company's "Standard Practices" manual, and is reviewed and updated yearly as required by the CFR. The Company is compliant with the annual review requirements described in the CFR.

The Company's reference to a three-year time period relates to a CFR requirement that the operator conduct periodic reviews of work to determine the effectiveness, and adequacy of the procedures used in normal operation and maintenance (see 49 C.F.R. 192.605(b)(8)). Under this requirement a "Subject Matter Expert" (SME) conducts such reviews at least once every three years relating to each individual operating procedure to

determine if the procedures are effective and adequate and to ensure that they are in alignment with how the work is actually being performed. This periodic review of work occurs in addition to the annual review of the Standard Practices manual. The Company is compliant with the annual review requirements of the CFR. The amended report filed in conjunction with this filing, and attached to these comments, includes language explaining the specific CFR requirements.

Finally, the Commission requested a response to the Division's recommendation that the semi-annual safety training reporting requirement be eliminated. The Company has taken steps to update its operating procedures and to enhance safety awareness and training. The Company agrees with the Division's recommendation that "the requirements of the Commission's order in Docket No. 07-057-04 be considered, in the aggregate, completed and closed." The Company will continue its safety training programs and will continue to find new ways to raise safety awareness regardless of whether or not it files a report. If the Division does not find the reports to be useful, Questar Gas supports the elimination of the reporting requirement.

CONCLUSION

The Company agrees that the purpose of the semi-annual safety training report has been met but will continue to work with the Commission and Division to improve these reports if necessary.

Dated this 1st day of October, 2014.

Respectfully submitted,

QUESTAR GAS COMPANY

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Questar Gas Company's Reply Comments, in Docket Nos. 07-057-04 and 14-999-02 was sent by electronic mail and/or mailed by U.S. Mail, postage prepaid to the foregoing on October _____, 2014, to the following:

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