

October 1, 2014

HAND-DELIVERED

Gary Widerburg
Commission Secretary
Public Service Commission of Utah
Heber M. Wells Building
160 East 300 South
Salt Lake City, Utah 84134

Dear Mr. Widerburg:

Re: *Confidential Semi-Annual Report; Docket No. 07-057-04*

Pursuant to the Order Approving Settlement Stipulation issued on November 20, 2008, the Company is filing an updated original and five copies of its Semi-Annual report “explaining the type and hours of training conducted both in-house at Questar Gas and in conjunction with the Blue Stakes Center of Utah.”

Part of this report is being submitted as a confidential document pursuant to R746-100-16 of the Commission Rules and the Protective Order in this docket and as such has been marked “Confidential-Subject to Protective Order in Docket No. 07-057-04” and copied on yellow paper. The confidential section is also subject to an exception under the Government Records Access and Management Act (GRAMA).

Section 63G-2-305(2) of GRAMA allows for an exception if the following are met:

- (a) Disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future;
- (b) The person submitting the information has a greater interest in prohibiting access than the public in obtaining access; and
- (c) The person submitting the information has provided the governmental entity with the information specified in Section 63G-2-309.

Utah Code Ann. §63G-2-305(2).

Gary Widerburg
January 21, 2014
Page Two

The information contained in the confidential section of the report is considered protected records, the disclosure of which “could reasonably be expected to result in unfair competitive injury to the person submitting the information...,” because the details of Questar Gas Company’s training bulletins are confidential and proprietary. The specific information included in the detailed summary of the training bulletins pertains to policies and procedures that are specific to Questar Gas Company, and could reasonably result in an unfair competitive injury to Questar Gas Company if others in the industry have access to the details.

Second, the information in the public section of the report filed by Questar Gas Company indicates that several training bulletins have been given to employees since January 1, 2013. Therefore, the general public has the necessary information, that the training bulletins were in fact prepared and communicated to Questar Gas Company employees. The details of the specific training bulletins do not contain necessary information for the general public, so Questar Gas Company has a greater interest in keeping those details private, rather than releasing those details to the general public.

Third, in compliance with U.C. A. §63G-2-309 Questar Gas Company has provided its written claim of confidentiality as well as its reasons supporting the claim of confidentiality to the Public Service Commission by way of this letter, as well as by submitting the confidential portion of the report on yellow paper as required by the Protective Order.

Should you have any questions, please contact me. Thank you.

Sincerely,

Jennifer Nelson Clark

JNC/gj
Enclosures

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