



State of Utah  
Department of Commerce  
Division of Public Utilities

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## ACTION REQUEST RESPONSE

**To: Public Service Commission**

From: Division of Public Utilities  
Chris Parker, Director  
Energy Section  
Artie Powell, Manager  
Doug Wheelwright, Technical Consultant  
Eric Orton, Utility Analyst

Date: October 14, 2014

Subject: Action Request Response in Docket 14-999-02, Questar Confidential Semi-Annual Training Report, submitted September 5, 2014

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### **BACKGROUND:**

On July 11, 2014 the Division of Public Utilities (Division) submitted an Action Request response in docket No. 14-999-02. In that response the Division recommended that the Public Service Commission of Utah (Commission) “discontinue the requirement that the Company provide a Semi-Annual Training Report each six months, within sixty days from June 30 and December 31 of each year.” Offering the opinion that “The report fulfilled its stated purpose of showing that the Company’s training levels increased from 2006 and is no longer relevant.”

On August 18, 2014 the Commission issued its order in this case requesting more information from Questar Gas Company (Company) and requiring that the Company file its response within 45 days.

On October 1, 2014 the Company submitted its response to the Commission's questions and an updated report. The Company supported the Division's recommendation stating: "Questar Gas supports the elimination of the reporting requirement" while adding "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." This is where the issue sits at the current time.

**DISCUSSION:**

As the Division's initial Action Request response in this docket specified, the Company's safety training report was not in complete compliance with the Commission's order in Docket No. 07-057-04. However, it was sufficient to fulfill the initial requirement of 10% improvement from 2006 through 2008.

The specified shortcomings in the safety training report were addressed in the Commission's current order. The Company's response to the Commission's requests for more information included the offer to "improve these reports if necessary". The thorough and accurate safety training reports were not provided. However, not having this information did not diminish the Division's ability to monitor the Company's safety record because of other internal reports generated and used within the Division. The information provided in the Company's safety training report is not compiled nor used by the Division.

Had the expert's findings uncovered that the Company was lax in its safety training, if the Division's Pipeline Safety Section did not monitor the Company's adherence to the federal

safety training requirements on a regular basis, or if the Division did not compile its own internal safety reports, then a complete safety report would be a beneficial tool in the Division's work. However, it is not.

**RECOMMENDATION:**

The Division continues to recommend "that the requirements of the Commission's order in Docket No. 07-057-04 be considered, in the aggregate, completed and closed". The report is no longer necessary.

CC: Austin Summers, Questar Gas Company

Kelly Mendenhall, Questar Gas Company

Michele Beck, Office of Consumer Services