

Questar Gas Company

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Barrie L. McKay Director Customer Rates & Regulation

April 12, 2017

Chairman Thad Levar Utah Public Service Commission Heber M. Wells Building, 4th Floor P. O. Box 146751 Salt Lake City, UT 84114-6751

Re: Questar Gas Compliance with Department of Transportation rule in Docket No. PHMSA-2011-0009; Amdt. No 192-121

Dear Chairman Levar,

I am writing to provide the Commission with information related to Questar Gas Company's (Questar Gas or the Company) planned actions to comply with new rules ordered by the US Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA).

On October 14, 2016, PHMSA released PHMSA-2011-0009; Amendment No. 192-121, addressing the installation of excess flow valves (EFVs). The rule includes the following requirements:

- 1. Operators will install EFVs on all new and replaced services 1,000 SCFH and under (49 CFR 192.383(b));
- 2. Operators will install a manual shut-off valve on all new and replaced services not having an EFV (49 CFR 192.385(b));
- 3. Operators will notify all customers of their right to request installation of an EFV on service lines that are not newly installed or being replaced (49 CFR 192.383(e)); and
- 4. Rate-setters will determine how and to whom the cost of the requested EFVs are distributed (49 CFR 192.383(d)).

Questar Gas intends to comply with these requirements as follows:

- 1. The Company is currently installing EFVs on service lines with a load of up to 5,000 standard cubic feet per hour and will continue to do so.
- 2. Beginning April 14, 2017, the Company will install a manual shut-off valve on all new and replaced services not having an EFV.

- 3. Beginning April 14, 2017, Questar Gas will notify customers on its website that EFVs are available to those who do not have them. Questar Gas will also provide an EFV discussion in the next Gaslight News in customer bills. A copy of both the website text and Gaslight News article are attached as Exhibit 1 and Exhibit 2.
- 4. The Company will install EFVs on new service lines, at the individual customer's expense, pursuant to Section 9.04 of its Utah Natural Gas Tariff No. 400 (Tariff). Additionally, the Company will also install EFVs on replaced service lines and existing service lines, at the individual customer's expense, pursuant to Section 8.01 of its Tariff.

It is important to note that, "Although PHMSA determined that mandatory installation on all existing lines would not be cost effective due to excavation labor costs, some individual households might have a high willingness-to-pay for EFV's due to differences in risk aversion, rate of time preference, and other factors." (49 CFR Part 192, Preamble, Page 70996). PHMSA also states, "Further it is PHMSA's understanding that customers would typically be required to pay for these installations." (49 CFR Part 192, Preamble, Page 70996).

The Company's tariff does not explicitly address customer requested EFV installations on existing service lines. However, Section 8.01 of the tariff does address meter relocations and/or service line changes at the customer's request. The tariff language states, "If the customer requests that the meter or service line be relocated, the Company will determine the feasibility of the move and provide a cost estimate for the work. The estimate will be based upon, but not limited to, the current cost of service line installation, meter resetting, permit fees and service deactivation if required. Upon acceptance of the estimate and payment by the customer, the work will be scheduled and completed." The tariff also currently requires new customers to pay for all material costs to install a service line. The EFV is included in these material costs. In order to be consistent with the current tariff, if a customer requests that the Company install an EFV on an existing service line, the Company will do so at the customer's expense.

Questar Gas provided additional information about the new PHMSA rule in its March 23rd, 2017 IRP Workshop. We would be happy to provide any additional information or answer any questions you may have.

Sincerely,

Barrie L. McKay

Director

Customer Rates and Regulation

cc: Public Service Commission Office of Consumer Services



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What is an EFV?

In the News

- Dominion Questar Names Members of Citizen Advisory Council (Nov. 28,
- · Capacity Enhancement Projects
- Salt Lake Improvement Projects

GasLight-News & Inserts

- · Utah April Insert
- · Wyoming-April Insert

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CUSTOMER 800-323-5517 (4) SERVICE

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An excess flow valve or EFV, is a small plastic valve that automatically stops the flow of gas if a service line breaks.

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MAIN LINE

Safety

Emergency Numbers Call 811 Before You Dig Pipeline Safety Integrity Management Plan Meter Protection Safety Brochures

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Right of Way

Safety Data Sheet

Pipeline Safety Brochure

EFVs help protect people and property

More than a decade ago, Questar Gas launched a safety initiative to install excess flow valves (EFVs) on new and replacement service lines. Today, more than 100,000 customers have an EFV on their natural gas service line. Customers who do not currently have an EFV may request one. The cost for installation will be between \$1,000-\$2,500, depending on the property, access, permitting, labor and equipment.

– Q&A —

Q1: What's an EFV?

A: An EFV is a small valve that automatically reduces the flow of gas if a customer or contractor accidentally breaks the service line while digging on the property.

Q2: Where is an EFV installed?

A: EFVs are commonly installed at the street where the service line ties into the main line.

Q3: Is an EFV the same thing as an earthquake valve?

A: No. Earthquake valves are installed at or near the gas meter and are designed to shut off the gas to a structure if the meter shakes. Questar Gas does not install earthquake valves.

Q4: What limitations do EFVs have?

A: EFVs do not protect against leaks caused by corrosion or lose fittings, or leaks that occur beyond the meter, such as gas piping and appliances.

Q5: Where is an EFV most effective?

A: EFVs are effective on service lines in new subdivisions and other areas with frequent excavation activity.

Q6: Who is eligible to have an EFV installed on their property?

A: Eligibility for an EFV is based on meter capacity and other federal regulations,

If you are interested in having an EFV installed on your service line, please contact Questar Gas at 1-800-378-2952 (0) to determine if your service line is eligible and to make arrangements for the installation.

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GASLIGHT NEWS INSERT

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