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**BEFORE THE
PUBLIC SERVICE COMMISSION OF UTAH**

APPLICATION FOR APPROVAL OF THIRD)
YEAR BUDGET FOR 2009 DEMAND SIDE) Docket No. 08-057-22
MANAGEMENT PROGRAMS AND)
MARKET TRANSFORMATION INITIATIVE)

I. INTRODUCTION

1. In its Order issued in Docket No. 05-057-T01 (Order), approving Questar Gas Company's (Questar Gas or Company) Application for Expedited Approval of Demand-Side Management (DSM) Programs and a Market Transformation Initiative (Original Application), the Commission ordered the Company to "submit a third year budget by October 1, 2008 for the third year of the proposed DSM programs and the market transformation initiative." Pursuant to the Order, Questar Gas respectfully submits this Application for Approval of its Third Year Budget for its 2009 DSM and market transformation initiative.

II. OVERVIEW OF PROPOSED 2009 DSM PROGRAMS AND MARKET TRANSFORMATION INITIATIVE

2. In the Original Application, the Company listed seven best practices for developing successful demand-side management programs. These seven best practices are:

1. Develop a comprehensive energy-efficiency approach;
2. Simplify and integrate program offerings;
3. Brand DSM and focus on customer service;
4. Develop strategic partnerships with market participants;
5. Provide customized service, when applicable;
6. Provide qualified, independent expertise; and
7. Integrate program evaluation early.

To date, through the design, development, launch, implementation and administration of DSM programs, the Company has successfully integrated, and in many cases exceeded, each best practices outlined in the original DSM Application. The Company's ThermWise energy-efficiency campaign is at the forefront among natural gas utility programs. The ThermWise rebate programs are customer friendly and cost effective. In addition to the implementation and development of the ThermWise energy-efficiency campaign, the Company and its program administrators understand the importance of customer service. To accomplish this, the Company has developed relationships with trade allies, including wholesalers, heating, ventilation and air conditioning (HVAC) and weatherization contractors, dealers and retailers. The Company has built flexibility into the implementation and marketing of programs to allow for customized service when required. The Company continues to utilize the independent and experienced knowledge base of its program administrators, Nexant, Inc. (Nexant) and Portland Energy Conservation, Inc. (PECI). Pursuant to the Order, the Company has worked closely with the Division of Public Utilities (Division) and DSM Advisory Group to develop a timely

and meaningful DSM evaluation plan which is currently being implemented through a contract with the Cadmus Group.

3. Based on input from the DSM Advisory Group, Utah-based trade allies, program administrators and other energy-efficiency stakeholders, Questar Gas is proposing that the eight existing DSM programs, be continued.

4. The existing DSM programs are: 1) the ThermWise Appliance Rebates Program; 2) the ThermWise Builder Rebates Program; 3) the ThermWise Business Rebates Program; 4) the ThermWise Weatherization Rebates Program; 5) the ThermWise HomeEnergy Audit Program; 6) the ThermWise Multifamily Rebates Program; 7) the ThermWise Business Custom Rebates Program; and 8) funding of \$500,000 for the Low-Income Weatherization Assistance Program administered by the Utah Department of Community and Economic Development.

5. **ThermWise Appliance Rebates.** This program offers rebates on qualifying program measures to customers. The Company is proposing to continue this program with the following improvements: 1) Increase the efficiency requirement for tankless water heaters from .80 Energy Factor (EF) to .82 EF to align with an ENERGY STAR label effective January 1, 2009; and 2) increase the efficiency requirement for Tier 1 ENERGY STAR clothes washers from 1.72 – 1.99 EF to 1.80 – 1.99 EF to align with a change to the ENERGY STAR label effective July 1, 2009. Questar Gas will continue to offer this program to customers in the Company's Utah service territory and PECCI will continue to administer the program. QGC DSM Exhibit 3.1 sets forth the complete program description for 2009.

6. **ThermWise Builder Rebates.** This program, offers rebates to residential builders for installing qualifying energy-efficiency measures. The Company is proposing to continue this program with the following improvements: 1) change the minimum efficiency

requirement of tankless water heaters to .82 EF; and 2) change the name of the ENERGY STAR with Federal Tax Credit measure to High Performance Home as the Federal Tax Credit is set to expire December 31, 2008. Changing the name of this measure does not affect the measure attributes, such as incentive requirements, savings levels and rebate amount. This program will continue to be administered by PECCI. Questar Gas will continue to make this program available to residential builders in its Questar Gas Utah service territory and to include incentives for installing natural gas energy-efficiency measures in newly constructed residences receiving service on a GS rate schedule. QGC DSM Exhibit 3.2 sets forth the complete program description for 2009.

7. **ThermWise Business Rebates.** This program, offers rebates to commercial customers who purchase and install qualifying natural gas efficiency measures. The Company is proposing to continue this program with the following improvements: 1) add a tankless water heater measure for units greater than 200,000 Btu input; 2) increase the efficiency requirement for tankless water heaters from .80 Energy Factor (EF) to .82 EF to align with an ENERGY STAR label effective January 1, 2009; 3) change boiler tune-up efficiency requirements to require a combustion efficiency gain be achieved for the tune-up; 4) split the window efficiency measure into two parts to reflect industry practices and to allow for site built windows or pre-fabricated windows; and 5) increase the efficiency requirement for Tier 1 ENERGY STAR clothes washers from 1.72 – 1.99 EF to 1.80 – 1.99 EF to align with a change to the ENERGY STAR label effective July 1, 2009. These program improvements more closely align with market conditions and help to ensure program savings is achieved as desired. The Company will continue to offer this program to GS commercial customers in the Company's Utah service territory and Nexant will continue to administer the program. QGC DSM Exhibit 3.3 sets forth the complete program description for 2009.

8. **ThermWise Weatherization Rebates.** This program offers residential customers rebates for installing qualifying weatherization measures. The Company is proposing to continue this program with the following improvements: 1) require a minimum of ten continuous feet of ductwork existing in unconditioned space in order to receive a rebate for duct sealing and/or insulation; and 2) transfer the programmable thermostat rebate measure and associated savings and costs from the Home Energy Audit program to the Weatherization program. A home energy audit will still be required for programmable thermostat rebate eligibility. This program will continue to be available to residential customers in the Company's Utah service territory and Nexant will continue to administer the program. QGC DSM Exhibit 3.4 sets forth the complete program description for 2009.

9. **ThermWise Home Energy Audit.** The Company is proposing to continue this program. Questar Gas offers and administers the ThermWise Home Energy Audit Program and Nexant and Fundamental Objects provide periodic consulting and assistance, as needed. This program includes two primary components: 1) in-home energy audits performed by trained and experienced Questar Gas Auditors, and 2) "do-it-yourself" mail-in audits with on-line data input availability. The in-home energy audit requires the customer to pay a nominal \$25 fee per account. This fee is added to the customer's gas bill. This fee is fully refundable by way of a credit on the customer's gas bill, upon participation in any ThermWise energy-efficiency rebate program. The do-it-yourself audit is offered at no charge. Customers participating in either home energy audit will receive a customized report recommending home improvements that can be implemented to reduce natural gas usage. In addition, the program will provide certain low-cost energy-efficiency measures at no charge for installation at the customer's residence. Questar Gas will continue to offer this program to customers in the

Company's Utah service territory and to administer the program. QGC DSM Exhibit 3.5 sets forth the complete program description for 2009.

10. **Low-Income Weatherization Assistance.** The Company is proposing to increase funding for the Low-Income Weatherization Assistance Program from \$250,000 per year to \$500,000 per year. Strong demand for furnace replacements from the program is driving the increased funding. The Company proposes to disburse \$250,000 every six months, with the disbursements occurring in January and in July. QGC DSM Exhibit 3.6 sets forth the complete program description for 2009.

11. **ThermWise Multifamily Rebates.** This program offers rebates for installing qualifying measures in multifamily projects. The Company is proposing to continue this program with the following improvement: align all rebate measures with other ThermWise programs (Appliance, Builder and Weatherization) to reduce customer and market confusion. To facilitate this change, the Company will add two rebate measures to the program; Tankless Gas Water Heaters, and Solar Assisted Gas Water Heating. In addition, the Company will remove the "in-unit" and "common" area distinctions from program measures, as well as the pre-existing condition requirements for insulation measures. This program targets both new and existing multifamily projects, and will continue to be available to Questar Gas Utah service territory property owners/managers, builders, developers, home owner associations, and tenants. Questar Gas will offer rebates for installation of high-efficiency space and water heating appliances, ENERGY STAR clothes washers, gas clothes dryers with moisture sensors, high-efficiency window replacements, upgrades to insulation and high-efficiency space and water heating appliances to multi-family projects. Questar Gas Company will offer rebates for adhering to or exceeding ENERGY STAR requirements for multifamily projects to builders of

new multi-family construction projects. PECEI will continue to administer this program. QGC DSM Exhibit 3.7 sets forth the complete program description for 2009.

12. **ThermWise Business Custom Rebates.** The Company is proposing to continue this program for 2009 with the following improvement: adding a limited engineering services offer to eligible customers for assistance with performing facility evaluation and engineering assessments for project savings. Questar Gas would make these services available on a case by case basis with limited funding available per project and a \$50,000 annual cap on the total available program budget for these services. This program targets new and existing Utah GS commercial customers. This program augments the existing ThermWise Business Rebates program by offering rebates to business customers for energy savings resulting from more customized energy systems improvements that are not otherwise available through a rebate from other ThermWise programs. The rebate would be in the form of a one-time cash payment to the customer upon successful completion and savings verification of the project. Nexant will continue to administer this program. QGC DSM Exhibit 3.8 sets forth the complete program description for 2009.

13. **Tariff Sheets.** Tariff sheets for all programs are attached in both legislative and proposed formats as QGC DSM Exhibit 3.9. The Company proposes that these tariff sheets become effective January 1, 2009.

III. MARKET TRANSFORMATION

14. In addition to the DSM programs outlined above, Questar Gas is proposing to continue its comprehensive market transformation initiative. Market transformation involves ongoing and lasting changes to natural gas appliances and new construction markets, as well as natural gas conservation. Questar believes that its DSM programs, including its market

transformation initiative, will continue to complement Governor Huntsman's goal of reducing energy consumption in Utah by 20% by 2015.

15. The market transformation initiative has four distinct components. The first component is a market awareness campaign designed to continue the Company's involvement in energy-efficiency and conservation promotion. The second component is a market awareness campaign designed to change consumer and market participant behaviors and to encourage persistent demand for energy-efficient products and practices.

16. The third component involves offering training related to building codes. The State Energy Program, a sub-division of the Utah Geological Survey, in partnership with and through partial funding from Questar Gas, conducted over forty building codes training sessions during 2007 and 2008. The purpose of the training was to support the adoption, awareness and enforcement of more stringent building codes associated with the current International Energy Conservation Code (IECC 2006), which became effective in Utah on January 1, 2007. Based on the success of previous training sessions, and the need in the market for additional and more specific training sessions, the Company is proposing to fund training sessions for 2009 at \$50,000. The training sessions will be scheduled beginning early-to mid-year 2009. The State Energy Program will continue to work with an outside vendor to design and conduct the training. QGC DSM Exhibit 3.10 sets forth a description of the proposed training.

17. The fourth component is the ThermWise.com website. The Company launched an informative, interactive, easy-to-use and dedicated energy-efficiency website (www.ThermWise.com) during 2007. The website provides consumers with DSM program descriptions and applications, information regarding the economics of energy efficiency, resources available to consumers to help them reduce their energy consumption, on-line energy

audit input capability and links to other useful websites related to energy efficiency and conservation. The Company proposes to continue developing, enhancing and operating this website to increase customer awareness, education and participation in energy efficiency and conservation.

18. The Company proposes to add one additional component to its Market Transformation efforts for 2009. The Company proposes to provide funding support to Salt Lake Community College (SLCC) to secure grant money to develop and offer an Associate Degree program for Energy Management. The Company's share of this funding would be \$40,000 over three years and would be matched by Rocky Mountain Power to enable SLCC to secure grant money to develop and implement the program.

19. Additionally, the Company has identified its existing Co-op Advertising Program offered to builders, dealers, contractor and retailers as energy-efficiency costs that are currently included in DNG rates. In the revenue requirement stipulation in the most recent general rate case, the parties agreed that the Co-op advertising program was directly related to energy efficiency and costs related to this program should be separately tracked as costs related to energy efficiency. These costs have typically been associated with the marketing department but they were modified in 2007 to align with the ThermWise initiative and encourage market participants to exclusively advertise, promote and sell high-efficiency natural gas appliances by sharing in the advertising costs of the market participant. Pursuant to the Stipulation referenced above, Questar Gas tracks these costs. When these costs are included with market transformation, the resulting benefit-cost ratios are: Total Resource Cost Test 1.8, Participant Test 2.5, Utility Cost Test 2.3, and Ratepayer Impact Measure Test 1.6. Comparing these ratios with those found in Exhibit 3.12, page 1, line 10, shows that the Co-op advertising can be included without a significant negative impact on the Benefit Cost Ratios.

20. As part of its Market Transformation initiative, the Company will continue to pursue strategies to influence each market segment in the GS rate class to adopt higher levels of energy efficiency. Initial market transformation goals include: 1) achieving higher penetration of high-efficiency furnaces and water heaters in new and existing residential and commercial buildings; 2) recruiting trade allies to promote and deliver a complete line of energy-efficiency products; 3) encouraging trade allies to price the higher-efficiency products competitively with lower-efficiency products; 4) positioning energy-efficiency products as the market leaders; and 5) working with code enforcement officials to ensure energy-efficiency aspects of the building codes are understood and adopted by builders.

IV. PROPOSED 2009 BUDGET

21. The total 2009 budget for Questar Gas DSM programs and the Market Transformation Initiative is estimated at \$17.8 million and is shown in QGC DSM Exhibit 3.11. The primary driver for the budget increase for 2009 is overwhelming interest and high levels of customer participation. As a result of the customer participation, Questar Gas anticipates paying approximately \$6.2 million more in rebates than projected in the 2008 budget. QGC DSM Exhibit 3.11 also includes the 2008 budget for reference. The budget estimate is predicated on participation levels projected by each program administrator. Twelve month actual customer participation, ending June 30, 2008 serves as a basis for projecting 2009 customer participation. To the extent actual participation levels differ from projected levels, actual costs will differ from budget. The Company will continue to report to the Division quarterly, and to provide the actual participation levels and related costs and gas savings compared to projections.

22. **ThermWise Home Energy Audit.** For 2009 this program will have very few operational changes from 2008. The systems and program created in 2007 and 2008 will

continue to provide value to the DSM effort and produce natural gas savings for customers in 2009. The Company is projecting that the number of year to year audits performed and the associated gas savings for this program will be similar to those seen in 2008. It is expected that the overall costs for the program in 2009 will increase by 3%, as compared to 2008.

23. **ThermWise Weatherization Rebates.** This program far exceeded expectations and was well received by Questar Gas customers in 2008. The positive customer acceptance and participation is expected to continue through 2009. The Company projects a 529% increase in overall weatherization program costs for 2009. Nearly all of the increase is directly attributable to an increase in the amount of rebates paid directly to customers. The projected natural gas savings for this program for 2009 are expected to increase by 608% from 2008 projections.

24. **ThermWise Builder Rebates.** For 2009 the Company is projecting a 3% reduction in program costs due mostly to a softening in the residential new single-family construction market. Fewer homes will likely result in lower program participation and less gas savings. The Company projects a 5% decrease in natural gas savings under the program for 2009. While overall program costs, participation and natural gas savings are projected to be lower for 2009, the Company still intends to continue cost-effective program marketing and implementation as reflected in the program budget.

25. **ThermWise Appliance Rebates.** This program has been very well received by customers in 2008. The Company expects the 2009 program budget to increase by 98% and the related gas savings to increase by 133%. Increases resulting from increased customer participation and rebates paid are reflected in the budget. Rebates account for approximately 79% of the annual costs for this program.

26. **ThermWise Business Rebates.** The Company projects that the 2009 program budget will increase by 47% over the 2008 budget, and that natural gas savings will increase by 90%. As with other ThermWise programs, increased customer participation is driving budget increases. This program budget also reflects an increase in cost-effective, program-specific marketing to bring increased awareness and participation to the program. This program has the potential to result in the highest gas savings measures per rebate paid. Therefore, the Company expects increased and targeted marketing to result in increased program cost-effectiveness.

27. **ThermWise Multi-family Rebates.** This program was new in 2008, and experienced some lag between the time of approval and implementation, and the point when customers were consistently participating. Customer awareness and participation in this program is increasing and the Company expects continued growth in 2009. The Company projects that the 2009 program budget will increase by 21% and the gas savings to increase by 13% over 2008 budgeted levels. Rebates account for approximately 47% of the annual costs for this program.

28. **ThermWise Business Custom Rebates.** This was also a new program for 2008, and experienced a substantial lag between the time of approval and implementation, and the time customers began to participate. There is more customer awareness and interest in this program as time goes on and the Company expects increased participation in 2009. Nonetheless, the Company expects the 2009 program budget to decrease by 40% and the gas savings to decrease by 51% over 2008 budgeted levels. Rebates account for only approximately 26% of the annual costs for this program but, due to the nature of this program, Questar Gas will not incur many of the program administrative costs unless it finds gas savings and a rebate is paid. Natural gas savings from customer participation in this program is usually substantial.

29. **Market Transformation.** The Company is proposing to build upon the success and momentum created in the previous two years with its ThermWise energy efficiency education and awareness campaign. The 2009 proposed budget for Market Transformation includes \$800,000 in media purchases for year round and targeted advertising (same as 2008), \$70,000 for special marketing events, trade/consumer shows and special event sponsorships and \$30,000 for national and regional industry association participation to leverage outside resources to advance energy efficiency in the state. The budget also includes \$30,000 for potential 2010 new program designs, which if needed, would occur and be paid for in 2009, \$13,300 for the SLCC Energy Management program, and \$50,000 for State of Utah codes training. The projected budget for Market Transformation increases by 3% over 2008.

30. **Low-Income Weatherization.** The 2009 proposed budget for this program is \$500,000, which is double the 2008 budget of \$250,000. The increase in funding for Low-income Weatherization is a result of recommendations by the QGC DSM Advisory Group, including the Division of Public Utilities, Salt Lake Community Action Program, Utah Clean Energy and the State of Utah Department of Community and Economic Development and will be used for high-efficiency furnace replacements in low-income households.

31. The total 2009 budget is expected to increase by \$7.3 million. Total projected savings is expected to increase by 192,161 Dth/year. This increase in the 2009 proposed budget is consistent with the commitment that the Company made when it agreed to aggressively promote and implement cost-effective energy-efficiency programs. In short, the 2009 proposed budget reflects a concerted effort to reach all GS market segments and produce significant, persistent and cost effective natural gas savings through a comprehensive energy efficiency campaign.

V. COST EFFECTIVENESS

32. A summary of the cost effectiveness for each program is attached as QGC DSM Exhibit 3.12. Page 1 of the exhibit summarizes the test results of the proposed programs along with the market transformation initiative. Although the market transformation initiative does not lend itself to the same economic analysis as the DSM rebate programs, it has been included so that the overall impact of all programs can be measured and analyzed. As shown on page 1, line 10, column C of QGC DSM Exhibit 3.12, the overall benefit-cost ratio for the Total Resource Cost (TRC) test of all programs and the market transformation activities is 1.8. And as shown on column G, the Utility Cost test (UCT) for all programs is 2.4. A benefit-cost ratio greater than 1 is indicative of benefits exceeding costs, and therefore “passes” the test. Additionally, as shown on line 10, column E, the overall benefit cost ratio for the participant cost test passes at 2.5, and as shown on column I, the ratepayer impact test for all programs passes at 1.7. A detailed benefit-cost analysis of each program by measure has been included in pages 2-11 of this exhibit.

33. The model developed by the Company to measure the cost effectiveness of the DSM Programs (DSM Model) is based on the California Standard Practice Manual and is the same model that was used in the 05-057-T01 docket. The DSM Model has been reviewed by Nexant and the DSM Advisory Group.

34. The DSM Model has the capability of running sensitivity analyses on various inputs and assumptions such as the discount rate and participation levels. The cost-effectiveness tests included in this application have been calculated using a 7% discount rate. This is the same discount rate that was used in the last year’s DSM program application and this interest rate is consistent with the Company’s IRP report filed in May 2008 (see IRP Report page 9-4).

35. The Company has relied on specific market reports, industry studies, the DSM Advisory Group, and the expertise of PECCI and Nexant to arrive at the savings levels, measure life and incremental customer cost for each measure of each program. QGC DSM Exhibit 3.13 provides the source and/or references for the estimated gas savings (pages 1-4), measure life (pages 5-7), and incremental cost (pages 8-11) for each measure of each program.

VI. PROGRAM EVALUATION

36. During the summer of 2007, the Company worked with the Division to develop a comprehensive and cost-effective DSM Evaluation Plan for natural gas DSM programs. The Commission gave approval to the DPU Evaluation Plan November 20, 2007. The Company began work on the Commission approved evaluation plan shortly after the order related to docket 07-57-05 was issued.

37. The Company published a request for proposal (RFP) from third-party evaluation firms on February 1, 2008. The Company sent the RFP to over forty evaluation firms and posted it on an industry website in an effort to obtain strong evaluation plans and competitive bids. As the Company conducted analysis of proposals, it also sought the support and advice of the DSM Advisory Group. Ultimately, the Company selected the proposal from the team of Cadmus (formerly Quantec) and TechMarket Works. The Company announced the winning proposal on April 11, 2008.

38. Cadmus/TechMarket Works began work on the evaluation plan after contracts were finalized in early June 2008. The plan requires Cadmus/TechMarket to submit an evaluation in two phases with a deliverable report due to the Company at the end of each phase. Phase I of the evaluation will look at program processes, including but not limited to the following: energy-efficiency programs and measures offered, accounting procedures, rebate funding process, general work flow, rebate process time-frame and safeguards such as fraud

prevention and auditing procedures, scheduling and customer interface, and research and evaluation.

39. The evaluators are currently working on Phase I data collection, interviews with program participants and non-participants, interviews with Company and contracted staff, and analysis of the deemed savings estimates for each program measure. The Phase I report deadline specified in the RFP is October 31, 2008.

40. Phase II of the evaluation will focus on the impact, process and market transformation attributable to the Company's DSM programs and measures. The overriding goal of the Phase II evaluation is to verify program cost effectiveness through impact analysis, natural gas savings verification, customer participation and overall program performance. Cadmus/TechMarket Works have begun data collection for the Phase II report and will continue to do so through the end of March 2010. The Phase II report is scheduled to be delivered to the Company by June 30, 2010.

VII. PRAYER FOR RELIEF

41. Questar Gas has successfully implemented a broad range of DSM programs and a Market Transformation Initiative in the first and second years of the DSM Pilot Program. The Company has implemented best practices to help ensure that necessary and reasonable steps have been taken to implement cost-effective programs that benefit all GS customers.

42. Therefore, Questar Gas respectfully requests a Commission order approving the application for the 2009 budget for Questar Gas' DSM programs and continuation of its market transformation initiative and approving the proposed tariff sheets.

DATED this 1st day of October, 2008.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Evelyn Zimmerman, certify that a true and correct copy of the foregoing

Application was served upon the following by electronic mail on October 1, 2008:

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