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March 29, 2019

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities & Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

**Re: UG-19\_\_\_\_\_, Cascade Natural Gas General Rate Case, Advice No. W19-03-02**

Dear Mr. Johnson,

Cascade Natural Gas Corporation (“Cascade” or “Company”) herewith submits the attached rate case filing wherein the Company seeks Commission authorization to increase its rates and charges for natural gas services to its customers in the state of Washington. The Company is proposing an overall increase of 5.56% in base rates or \$12,708,529 for natural gas service.

The Company includes an original and five (5) paper copies of the Company’s prefiled direct testimony and exhibits supporting this general rate case filing. In accordance with WAC 480-07-510, all documents have been electronically filed consistent with the requirements in WAC 480-07-140. One complete copy of all documentation has also been served on Public Counsel. The summary document has been served to the persons listed on the Certificate of Service attached to this letter.

In accordance with WAC 480-07-510(4)(a), electronic copies of supporting workpapers will be filed with Commission Staff with a copy to Public Counsel within five business days of the date of this filing.

This submission includes the following revisions to Cascade’s Tariff, WN U-3, stated to become effective with service on and after May 1, 2019:

Fifth Revision Sheet No. 25  
Sixty-First Revision Sheet No. 503  
Forty-Fifth Revision Sheet No. 504  
Forty-Fourth Revision Sheet No. 505

Sixty-Second Revision Sheet No. 511  
Fifty-Sixty Sheet No. 570  
Sixth Revision Sheet No. 663-A

Cascade proposes revising the above tariffs to include changes to rates. A more in-depth discussion of the following changes is included in the Direct Testimony of Pamela J. Archer, Exhibit No. \_\_ (PJA-1T):

- The gross revenue fee in Rate Schedule 663, which collects the costs for uncollectibles, UTC fees, and State B&O taxes, is going down;
- Company is proposing an update to the lost and unaccounted for percentage in Rate Schedule 663, from 0.1615 percent to .2479 percent; and
- Consistent with a revised revenue requirement, Cascade is proposing changes to the authorized margin revenue per customer as stated on Sheet 25 in Rule 21, Decoupling Mechanism.

In compliance with WAC 480-90-193(1), the Company will post the proposed changes to its tariff on its website: [www.cngc.com](http://www.cngc.com).

Cascade requests the Commission **immediately suspend the operation of the general tariff revisions** included in this filing and promptly set the matter for hearing, including the establishment of a prehearing conference at the earliest possible date.

Included with this cover letter are the following attachments:

- Attachment A – The proposed tariffs
- Attachment B – The legislative tariffs
- Attachment C – A summary document of the Company’s proposed case as required per WAC 480-07-510.
- Attachment D – The Index of Testimony, Exhibits, and Work Papers
- Attachment E – The List of Files included in the electronic submission
- Attachment F – The Rate Case Compliance Matrix
- Attachment G – Financial Documents required per WAC 480-07-510(7)
- Attachment H – Certificate of Service
- Attachment I – Affiliated Interest Transactions per WAC 480-07-510(3)(g)
- Claim of Confidentiality
- Testimony, Exhibits, and Work Papers
- CD – Contains the electronic files

Cascade has marked certain sections of the exhibits of Tammy Nygard "**SHADED INFORMATION IS DESIGNATED AS CONFIDENTIAL PER WAC 480-07-160.**" Please note that the Company has also simultaneously-filed a sworn claim of confidentiality as required by WAC 480-07-160(4) and a motion for protective order.

The Company therefore requests that the documents contained in the envelopes identified with the cover page marked "**SHADED INFORMATION IS DESIGNATED AS CONFIDENTIAL PER WAC 480-07-160**" as well as the files marked "Shaded Information Is

Designated as Confidential per WAC 480-07-160” be treated as confidential under the provisions of WAC 480-07-160, as they each contain sensitive commercial information. In accordance with WAC 480-07-160(5)(c), the Company has enclosed redacted versions of the documents containing confidential information along with the non-confidential documents in its filing, and has placed unredacted versions of the documents containing confidential information in separate envelopes with corresponding “**SHADED INFORMATION IS DESIGNATED AS CONFIDENTIAL PER WAC 480-07-160**” labels on the envelopes. Each page of the unredacted version containing confidential information has been printed on yellow paper.

Service of documents pertaining to this filing should be to the following Cascade Natural Gas Corporation representatives:

Michael Parvinen  
Director of Regulatory Affairs  
Cascade Natural Gas Corporation  
8113 West Grandridge Boulevard  
Kennewick, WA 99336-7166  
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McDowell Rackner & Gibson PC  
419 SW 11<sup>th</sup> Avenue, Suite 400  
Portland, OR 97205  
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Facsimile: 503-595-3928  
Email: [lisa@mcd-law.com](mailto:lisa@mcd-law.com)

Additional copies of this filing, supporting testimony, exhibits and work papers are available from the Company upon request subject to any restrictions on information that is protected from public disclosure.

Questions regarding this filing should be directed to Michael Parvinen at (509) 734-4593.

Sincerely,

*/s/ Michael Parvinen*

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Enclosures