



In the Community to Serve®

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January 7, 2014

Oregon Public Utility Commission
Attn: Kathy Williams
P.O. Box 1088
Salem, OR 97308-1088

Re: Application for Extension of 2014 IRP Filing date

Dear Ms. Williams:

Pursuant to ORS Chapter 757 and in accordance with OAR Chapter 860, Cascade Natural Gas Corporation petitions the Oregon Public Utility Commission for an extension of the filing date for the Company's Natural Gas Integrated Resource Plan ("IRP"). The Company requests the action date of this request by February 13, 2014. The original copy of this application is being provided via overnight mail.

If there are any questions regarding this request, please contact me at (509) 734-4589 or via email at mark.sellers-vaughn@cngc.com.

Sincerely,
CASCADE NATURAL GAS CORPORATION

A handwritten signature in black ink that reads "Mark Sellers-Vaughn". The signature is written in a cursive, flowing style.

Mark Sellers-Vaughn
Manager, Supply Resource Planning

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

DOCKET NO: _____

In the Matter of the Application of
CASCADE NATURAL GAS CORPORATION } APPLICATION
For an Order Extending the Integration Plan }
Filing Date }

1. Pursuant to ORS Chapter 757 and in accordance with OAR Chapter 860, Cascade Natural Gas Corporation (“Cascade” or “Company”) petitions the Oregon Public Utilities Commission to extend the deadline for filing of the Company’s Integrated Resource Plan (“IRP”) to February 11, 2015. Please direct all correspondence regarding the Petition to the following:

Mark Sellers-Vaughn
Manager, Supply Resource Planning
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Telephone: (509) 734-4589
E-mail: Mark.Sellers-Vaughn@cngc.com

Jon Whiting
Director, Gas Supply CNGC/IGC
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Telephone: (509) 734-4549
E-mail: Jon.Whiting@cngc.com

1 2. The Company is required by OAR 860-027-0400(3) to file its Integrated Resource
2 Plan within two years after the date the previous plan was acknowledged.
3 Cascade's 2011 Integrated Resource Plan was acknowledged by Order 12-342 on
4 August 14, 2012. Cascade Natural Gas Corporation respectfully requests an extension
5 of its 2014 Integrated Resource Plan from the August 14, 2014 deadline to February 11,
6 2015. The extension is requested in order to allow additional time to ensure that the
7 supply resource analysis and preferred portfolio analyses are better informed. The
8 Company's 2011 Integrated Resource Plan's demand forecast and pipeline capacity
9 needs were developed at the pipeline zonal level. Consequently, the analysis to
10 determine potential peak day shortfalls was performed at the zonal level. The Company
11 has used this analysis as part of its ongoing efforts to identify areas where pipeline
12 capacity could be re-aligned or to pursue other means to meet the peak day demand
13 such as acquiring incremental pipeline capacity. The Company believes that a more
14 accurate picture of the capacity needs can be obtained if resource and demand modeling
15 and analysis are performed at a more detailed level than the zonal level. The Company
16 feels developing the plan at the city gate level will significantly improve our planning
17 and provide more transparency to stakeholders.
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23 3. The Company believes that a six month delay will allow Cascade time to complete
24 the modifications to our planning tools to develop demand and capacity analysis at the
25 pipeline city gate level. In order to accomplish this more robust demand and capacity
26 analysis the Company has undertaken a near total reconfiguration of the SENDOUT
27 resource optimization model, which is a highly complex and time consuming process.
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1 By delaying the plan by six months, we should be able to complete the configuration of
2 the modeling at the city gate level. At the city gate level, the Company can perform
3 more detailed analysis, allowing Cascade to better identify specific locales where
4 shortfalls may exist. This more detailed analysis will better inform all stakeholders,
5 allowing for a more robust discussion during the public process (technical advisory
6 group meetings) on how best to address specific capacity needs or determine what
7 alternative resources may be needed to meet long term demand.
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11 For these reasons, the Company respectfully requests that the Commission extend the
12 IRP filing deadline to February 11, 2015. OAR 860-027-0400 contemplates that the
13 Commission may, by order, extend the prescribed filing date for good cause. The
14 Company believes the forgoing application will be beneficial to the stakeholders and is
15 in the public interest.
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18 DATED: January 7, 2014.

19 Respectfully submitted,

20 CASCADE NATURAL GAS CORPORATION
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24 Mark Sellers-Vaughn
25 Manager, Supply Resource Planning
26 Cascade Natural Gas Corporation
27 8113 W. Grandridge Blvd.
28 Kennewick, WA 99336
Telephone: (509) 734-4589
E-mail: mark.sellers-vaughn@cngc.com

CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing notice of Cascade's request regarding a filing extension for the 2014 Integrated Resource Plan upon all parties of record in the (LC 54) proceeding, by emailing an electronic copy to the following parties or attorneys of parties:

**CABLE HUSTON BENEDICT
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SALEM OR 97301-4096
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DATED at Kennewick, Washington, this 7th day of January 2014

/s/ Maryalice Rosales
Maryalice Rosales
Regulatory Analyst II
Cascade Natural Gas Corporation