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April 3, 2020

Oregon Public Utility Commission
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

RE: UG 390 – Cascade Natural Gas Corporation’s Petition for a Waiver of OAR 860-022-0017(1)

Attention Filing Center:

Cascade natural Gas Corporation, pursuant to the provisions of ORS 756.040 and in accordance with OAR 860-021-0005 encloses for filing its Petition for Waiver of OAR 860-022-0017(1).

If you have any questions concerning this submittal, please contact me at (509) 734-4593.

Sincerely,

/s/ Michael Parvinen

Michael Parvinen
Director, Regulatory Affairs

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UG 390**

In the Matter of
Cascade Natural Gas Corporation
Petition for a Waiver of OAR 860-022-0017(1)

PETITION OF CASCADE NATURAL
GAS CORPORATION

1 Cascade Natural Gas Corporation (Cascade or Company) files this petition under the
2 provisions of ORS 756.040 and in accordance with OAR 860-021-0005. Cascade seeks an order
3 from the Public Utility Commission of Oregon (Commission) granting a waiver of OAR 860-
4 022-0017(1). OAR 860-022-0017(1) requires the utility to inform customers within 15 days of
5 filing with the Commission new or revised tariff schedules which constitute a general rate
6 revision. The Company respectfully requests a waiver of OAR 860-022-0017(1) to allow the
7 Company additional time to inform customers of its general rate relief filing under Docket UG-
8 390.

I. Background

10 Cascade makes it a top priority to keep customers informed about rate revisions and any
11 changes that impact their bill. The Company regularly communicates with customers regarding
12 changes to rates and other operational changes through various channels including customer bill
13 inserts which is the most economical and reaches each customer. Cascade filed its current rate
14 case UG 390 on March 31, 2020. The anticipated customer bill impacts were not known by the
15 company until just prior to the rate case filing. This short time window made it infeasible for
16 Cascade to meet planning requirement deadlines necessary to send out customers notices via bill
17 inserts within the 15-day requirement as outlined in OAR 860-022-0017 (1). Cascade has

1 prepared a customer announcement which it intends to send to customers immediately within the
2 operational constraints of printing and mailing announcements to its approximately 77,000
3 customers within its Oregon service territory. As such, the announcements may initially be
4 received by customers outside of the 15-day requirement and well into the month of May 2020.
5 Cascade’s unique geographically challenged service territory makes using bill insert notification
6 far more economical for the Company and ultimately customers.

7 A delay in providing notice to customers will not constitute a hardship or interrupt any
8 customer’s ability to participate in the process due to the long-term nature of a general rate case
9 proceeding.

10 II. Governing Authority

11 Commission rules require utility to announce utility tariff changes within a specified 15-
12 day timeframe:

13 OAR 860-022-0017(1) requires the following:

14 (1) Within 15 days of filing with the Commission new or revised tariff schedules
15 which constitute a general rate revision, an energy or large
16 telecommunications utility shall inform its customers of the filing. A “general
17 rate revision” is a filing by an energy or large telecommunications utility
18 which affects all or most of a utility’s rate schedules. “General rate revision”
19 excludes changes in an automatic adjustment clause under ORS 757.210(1),
20 changes in the credit reflected on certain electric company rate schedules
21 relating to Section 5(c) of the Pacific Northwest Electric Power Planning and
22 Conservation Act of 1980, or similar changes in one rate schedule, such as for
23 an amortization, that affects other rate schedules.

1 OAR 860-022-0017(2) stipulates way by which customers may be informed:

2 (2) The energy or large telecommunications utility shall inform its customers by:

3 (a) Inserting a display announcement, not less than a three column
4 standard advertising unit (SAU) by ten-inch advertisement, at least once in
5 a newspaper of general circulation in the communities served by the
6 energy or large telecommunications utility;

7 (b) Inserting an announcement in the energy or large telecommunications
8 utility's regular billing to its customers; or

9 (c) Mailing an announcement to each customer.

10 **III. Request for Waiver**

11 OAR 860-021-0005 allows the Commission to grant waivers of Division 21 rules
12 for good cause shown. Cascade respectfully seeks waiver of the specific provisions of OAR
13 860-022-0017(1) requiring the utility to send announcements regarding its proposed rate
14 revisions in docket UG 390 within 15 days of filing. The Company intends to make a good faith
15 effort to send such announcements immediately within the time and operation constraints
16 required to execute its bill insert mailing.

17
18 DATED: April 3, 2020

19
20 Sincerely,

21
22 */s/ Michael Parvinen*

23
24 _____
25 Michael Parvinen
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27 Cascade Natural Gas Corporation
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