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September 30, 2024

Oregon Public Utility Commission
Attn: Filing Center
201 High Street S.E., Suite 100
Salem, OR 97301-3398

Re: UM 1336(17) – Reauthorization for Deferred Accounting Treatment of Intervenor Funding

Cascade Natural Gas files the enclosed Application for Reauthorization to Defer Intervenor Funding Grants.

If there are any questions regarding this application, please contact me at (208) 377-6015.

Sincerely,

/s/ Lori A. Blattner

Lori A. Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336-7166
Lori.blattner@intgas.com

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1336**

In the Matter of
Cascade Natural Gas Corporation
For Reauthorization to Defer
Intervenor Funding

APPLICATION FOR
REAUTHORIZATION FOR
DEFERRED ACCOUNTING

I. INTRODUCTION

In accordance with ORS 757.259 and OAR 860-027-0300, Cascade Natural Gas Corporation (“Cascade” or the “Company”) applies to the Public Utility Commission of Oregon (“Commission”) for an accounting order reauthorizing the Company to record and defer, on an ongoing basis, the cost of intervenor funding grants provided to qualifying organizations pursuant to the provisions of ORS 757.259 (3), as amended by OR Laws 2003, ch. 234 (“Intervenor Funding Grants”). The Company’s request is for the 12-month period beginning November 1, 2024 and ending October 31, 2025. In support of this application, Cascade provides the following:

II. APPLICATION FOR REAUTHORIZATION TO DEFER

In compliance with the requirements for applications for reauthorization to defer costs as established in OAR 860-027-0300(3) and (4,) and Commission Order No. 09-263, Cascade submits the following:

A. Description of Utility Expense – OAR 860-027-0300(3)(a)

In accordance with ORS 757.259(3) and the Fifth Amended and Restated Intervenor Funding Agreement (“Agreement”) approved by the Commission in Order No. 22-506, Cascade requests reauthorization to record and defer from November 1, 2024, through October 31, 2025, any and all Intervenor Funding Grants, as defined and provided for in the Agreement for later incorporation in rates. Cascade will record and defer these ongoing costs upon payment of

the Intervenor Funding Grants following the Commission’s approval of the Intervenor Funding Grant and issuance of an Order directing the Company to make payment, pursuant to the Agreement.

At the time of consideration for incorporation into rates, Cascade will propose an appropriate amortization period for the Intervenor Funding Grants for the Commission’s consideration.

B. Reason for Deferral – OAR 860-027-0300(3)(b)

This request is made in accordance with ORS 757.259(3) that allows for the deferral of Intervenor funds, and Commission Order No. 22-506 Docket UM 2264, which directs Cascade to pay to intervenors the amounts made available as defined and provided for in the Agreement.

C. Proposed Accounting - OAR 860-027-0300(3)(c)

Cascade Natural Gas proposes to record payment of Intervenor Funding Grants in a sub-account of Account 186. In the absence of the Commission’s approval of this Application, Cascade would not incur the cost of Intervenor Funding Grants. Were such costs incurred, however, they would be recorded in an appropriate sub-account of FERC Account 401.

D. Estimate of Amounts - OAR 860-027-0300(3)(d)

The table below shows the maximum amounts per the Agreement that may be deferred during the 12-month period, November 1, 2024, through October 31, 2025:

Fund Type as Defined in Agreement	Maximum Amount
CUB Fund	\$45,425
Preauthorized Matching Fund	\$42,713
Issue Fund- General Account	\$39,675
Issue Fund- Case-Certified Account	\$2,500

Total	\$130,313
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E. A Description and Explanation of the Entries in the Deferred Accounts – OAR 860-027-0300(4)(a)

Attached as Appendix A to this application are workpapers detailing the amounts deferred to-date under UM 1336. Also attached to Appendix A is a list of year 2024 intervenor payments by date, Order and Docket number, and whom it was paid to.

F. A Copy of the Notice of Application and Certificate of Service – OAR 860-027-0300(3)(e)

Attached as Appendix B is the copy of the Notice and the Certificate of Service verifying the Notice was served on parties to the Company’s current general rate case, UG-390.

G. The Reason for Continuation of Deferred Accounting – OAR 860-027-0300(4)(b)

The continuation of intervenor funds is justified per Commission Order No. 22-506 approving the terms of the Agreement.

H. Requirements per Commission Order No. 09-263

Below is the information required per Commission Order No. 09-263, issued in Docket UM-1286, Staff’s investigation into purchased gas adjustment mechanism.

1. A complete Summary Sheet, the location in the PGA filing, and an account map that highlights the transfer of dollars from one account to another.

Appendix A includes the Summary Sheet, which shows the amounts deferred and demonstrates the transfer of dollars from one account to another. Appendix A will be attached to the Company’s electronic 2024-2025 PGA filing as a file entitled, “UG 491 UG 492 UG 493 UG 494 Supplemental CNGC Gas & Non Gas Cost Model WP 9.13.24.xlsx.”

2. The effective date of the deferral

This application is for the 12-month period beginning November 1, 2024 and ending October 31, 2025.

3. Prior Year Order Number approving the deferral

Authorization to defer costs in this docket was most recently granted per Commission Order No. 23-361.

4. The amount deferred last year

	CUB Fund	AWEC Fund
	<u>Acct 20444</u>	<u>Acct 20449</u>
Deferred amounts July 1, 2023, through June 30, 2024	\$54,535.40	\$29,888.15

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5. The amount amortized last year

	CUB Fund	AWEC Fund
	<u>Acct 20443</u>	<u>Acct 20448</u>
Amortized amounts July 1, 2023, through June 30, 2024 with interest	(\$46,745.62)	(\$3,252.97)

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6. The interest rate that will be applied to accounts

The deferred balance accrues interest at the rate of 7.071%¹. The amortized balance will accrue interest at the rate of 5.13% through October 2024. Beginning November 2025, the amortized balance will accrue interest at the rate of 5.40%².

7. An estimate of the upcoming PGA-period deferral and/or amortization

The Company estimates that it will not seek to defer more than \$130,313. Cascade will seek to amortize the total deferral balance.

¹ Authorized Rate of Return as approved in the Company's most recently concluded rate case, Commission Order No. 21-001 in docket No. UG-390.

² Modified Blended Treasury (MBT) rates per annual staff calculation authorized in Dockets UM 1147 and UG 221.

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Lori Blattner Cascade Natural Gas 8113 W. Grandridge Blvd Kennewick, WA 99336 Email: lori.blattner@intgas.com	Department of Regulatory Affairs Cascade Natural Gas 8113 W. Grandridge Blvd Kennewick, WA 99336 Email: CNGCregulatory@cngc.com
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Cascade requests that in accordance with ORS 757.259 and OAR 860-027-0300, the Commission authorize the Company to defer the expenses described in this Application.

Sincerely,

Lori A. Blattner
Director, Cascade Natural Gas Corporation
8113 W. Grandridge Blvd
Kennewick, WA 99336
lori.blattner@intgas.com

APPENDIX A

State:	Oregon
Description:	OR CUB Intervenor Funding Deferral
Account number:	47OR.1860.20444
Class of Customers:	Core: Rate schedule 101
Deferral Period:	Annual
Deferral Account Order:	11/1/23 to - 10/31/24
Amortization Period:	
Narrative:	Oregon intervenor funding paid to the Citizens Utility Board of Oregon. Limited to \$44,425.00 deferral per calendar year.

Debit (Credit)

Month/Year	Rate	Therms	Deferral	Amortization	Interest	Adjustments	Deferred Balance
				TRANSFER BALANCE TO 20443		(54,189.06)	0.00
Nov-21			0.00		0.00		0.00
Dec-21			0.00		0.00		0.00
Jan-22			39,500.00		0.00		39,500.00
Feb-22			0.00		214.26		39,714.26
Mar-22			0.00		238.50		39,952.76
Apr-22			0.00		232.20		40,184.96
May-22			0.00		241.33		40,426.29
Jun-22			0.00		234.95		40,661.24
Jul-22			0.00		244.19		40,905.43
Aug-22			0.00		245.66		41,151.09
Sep-22			0.00		239.16		41,390.25
Oct-22			0.00		248.57		41,638.82
				TRANSFER BALANCE TO 20443		(41,638.82)	0.00
Nov-22			0.00		0.00		0.00
Dec-22			4,286.00		0.00		4,286.00
Jan-23			0.00		25.74		4,311.74
Feb-23			0.00		23.39		4,335.13
Mar-23			45,425.00		26.03		49,786.16
Apr-23			0.00		289.35		50,075.51
May-23			0.00		300.73		50,376.24
Jun-23			0.00		292.78		50,669.02
Jul-23			0.00		304.29		50,973.31
Aug-23			6,000.00		306.12		57,279.43
Sep-23			0.00		332.90		57,612.33
Oct-23			0.00		345.99		57,958.32
				TRANSFER BALANCE TO 20443		(51,887.21)	6,071.11
Nov-23			0.00		35.28		6,106.39
Dec-23			0.00		36.67		6,143.06
Jan-24			46,787.75		36.89		52,967.70
Feb-24			0.00		297.58		53,265.28
Mar-24			0.00		319.89		53,585.17
Apr-24			0.00		311.43		53,896.60
May-24			0.00		323.68		54,220.28
Jun-24			0.00		315.12		54,535.40

APPENDIX A

State:	Oregon
Description:	OR 11/01/12 Consolidated Accounts: Non Gas Cost Related PGA Temporary Rate Increments
Account number:	UM1336 Industrial Intervenor Funding
Class of Customers:	47OR.1860.20449
Deferral Period:	105, 111, 170, 163, 164
Deferral Account Order:	Annual
Amortization Period:	11/1/23 to 10/31/24
Narrative:	This records consolidated deferral accounts for industrial intervenor funding

Debit (Credit)

Month/Year	Rate	Therms	Deferral	Amortization	Interest	Adjustments	Deferred Balance
			TRANSFER BALANCE TO 20448			(40,490.44)	0.00
Nov-21			3,452.15		0.00		3,452.15
Dec-21			0.00		20.73		3,472.88
Jan-22			0.00		20.86		3,493.74
Feb-22			0.00		18.95		3,512.69
Mar-22			0.00		21.10		3,533.79
Apr-22			0.00		20.54		3,554.33
May-22			1,409.20		21.35		4,984.88
Jun-22			0.00		28.97		5,013.85
Jul-22			0.00		30.11		5,043.96
Aug-22			0.00		30.29		5,074.25
Sep-22			0.00		29.49		5,103.74
Oct-22			0.00		30.65		5,134.39
			TRANSFER BALANCE TO 20448			(5,134.39)	0.00
Nov-22			2,598.83		0.00		2,598.83
Dec-22			0.00		15.61		2,614.44
Jan-23			0.00		15.70		2,630.14
Feb-23			0.00		14.27		2,644.41
Mar-23			0.00		15.88		2,660.29
Apr-23			0.00		15.46		2,675.75
May-23			0.00		16.07		2,691.82
Jun-23			0.00		15.64		2,707.46
Jul-23			0.00		16.26		2,723.72
Aug-23			0.00		16.36		2,740.08
Sep-23			0.00		15.92		2,756.00
Oct-23			0.00		16.55		2,772.55
			TRANSFER BALANCE TO 20448			(2,772.55)	0.00
Nov-23			3,507.40		0.00		3,507.40
Dec-23			0.00		21.06		3,528.46
Jan-24			0.00		21.19		3,549.65
Feb-24			0.00		19.94		3,569.59
Mar-24			25,776.35		21.44		29,367.38
Apr-24			0.00		170.68		29,538.06
May-24			0.00		177.39		29,715.45
Jun-24			0.00		172.70		29,888.15

APPENDIX A

State:	Oregon
Description:	OR CUB Intervenor Funding
Account number:	47OR.1860.20443
Class of customers:	Core: Rate schedule 101
Deferral period:	Annual
Amortization period:	11/1/2023 through 10/31/2024
Narrative:	Oregon intervenor funding paid to the Citizens Utility Board of Oregon. (Schedule 192)

Debit (Credit)

Month/Year	Rate	Therms	Deferral	Amortization	Interest	Adjustments	Deferred Balance
				Transfer Balance from 20444		54,189.06	53,869.37
Nov-21	Prorated	3,737,625		(3,961.14)	54.90		49,963.13
Dec-21	(0.00104)	5,931,205		(6,168.45)	52.62		43,847.30
Jan-22	(0.00104)	9,067,618		(9,430.32)	46.18		34,463.16
Feb-22	(0.00104)	7,001,198		(7,281.25)	32.78		27,214.69
Mar-22	(0.00104)	7,294,458		(7,586.24)	28.66		19,657.11
Apr-22	(0.00104)	4,746,240		(4,936.09)	20.03		14,741.05
May-22	(0.00104)	4,160,510		(4,326.93)	15.52		10,429.64
Jun-22	(0.00104)	2,669,360		(2,776.13)	10.63		7,664.14
Jul-22	(0.00104)	1,337,273		(1,390.76)	8.07		6,281.45
Aug-22	(0.00104)	1,090,074		(1,133.67)	6.62	431.31	5,585.71
Sep-22	(0.00104)	1,203,624		(1,251.77)	5.69		4,339.63
Oct-22	(0.00104)	2,621,633		(2,726.50)	4.57		1,617.70
				Transfer Balance from 20444		41,638.82	43,256.52
Nov-22	Prorated	8,552,376		(7,378.88)	64.71		35,942.35
Dec-22	(0.00085)	9,672,115		(8,221.30)	55.56		27,776.61
Jan-23	(0.00085)	7,526,450		(6,397.49)	42.94		21,422.06
Feb-23	(0.00085)	8,205,952		(6,975.06)	29.91		14,476.91
Mar-23	(0.00085)	6,666,011		(5,666.11)	22.38		8,833.18
Apr-23	(0.00085)	5,279,911		(4,487.93)	13.21		4,358.46
May-23	(0.00085)	1,438,687		(1,222.88)	6.74		3,142.32
Jun-23	(0.00085)	1,554,489		(1,321.32)	4.70		1,825.70
Jul-23	(0.00085)	620,718		(527.61)	2.82		1,300.91
Aug-23	(0.00085)	977,747		(831.08)	2.01		471.84
Sep-23	(0.00085)	1,505,760		(1,279.90)	0.71		(807.35)
Oct-23	(0.00085)	4,050,150		(3,442.63)	(1.25)		(4,251.23)
				Transfer Balance from 20444		51,887.21	47,635.98
Nov-23	Prorated	6,244,843		(6,048.81)	200.85		41,788.02
Dec-23	(0.00096)	6,938,202		(6,660.67)	182.07		35,309.42
Jan-24	(0.00096)	9,767,752		(9,377.04)	153.84		26,086.22
Feb-24	(0.00096)	6,221,753		(5,972.89)	106.32		20,219.65
Mar-24	(0.00096)	5,717,321		(5,488.63)	88.10		14,819.12
Apr-24	(0.00096)	4,292,532		(4,120.83)	62.48		10,760.77
May-24	(0.00096)	2,753,584		(2,643.44)	46.88		8,164.21
Jun-24	(0.00096)	1,282,654		(1,231.34)	34.42		6,967.29

APPENDIX A

State:	Oregon
Description:	OR 11/01/12 Consolidated Accounts: Non Gas Cost Related PGA Temporary Rate Increments UM1336 Industrial Intervenor Funding
Account number:	47OR.1860.20448
Class of customers:	105, 111, 170, 163, 164
Deferral period:	Annual
Amortization period:	11/01/2023 through 10/31/2024
Narrative:	This records consolidated deferral accounts for industrial intervenor funding corresponding to the temporary technical adjustments included in the PGA tracker effective 11/1/12 that are incorporated in the customers' per therm gas rates. (Schedule 192)

Month/Year	Rate	Therms	Deferral	Amortization	Interest	Adjustments	Deferred Balance
				Transfer Balance from 20449		40,490.44	40,203.41
Nov-21	Prorated	3,768,331		(3,140.24)	40.97		37,104.14
Dec-21	(0.00085)	3,984,924		(3,387.19)	39.08		33,756.03
Jan-22	(0.00085)	4,229,425		(3,595.01)	35.55		30,196.57
Feb-22	(0.00085)	3,752,319		(3,189.47)	28.72		27,035.82
Mar-22	(0.00085)	3,657,371		(3,108.77)	28.47		23,955.52
Apr-22	(0.00085)	3,591,194		(3,052.52)	24.41		20,927.41
May-22	(0.00085)	3,239,303		(2,753.41)	22.04		18,196.04
Jun-22	(0.00085)	3,178,517		(2,701.74)	18.55		15,512.85
Jul-22	(0.00085)	3,472,829		(2,951.90)	16.34		12,577.29
Aug-22	(0.00085)	3,524,847		(2,996.12)	13.25		9,594.42
Sep-22	(0.00085)	3,872,586		(3,291.69)	9.78		6,312.51
Oct-22	(0.00085)	4,813,533		(4,091.49)	6.65		2,227.67
				Transfer Balance from 20449		5,134.39	7,362.06
Nov-22	Prorated	4,439,521		(1,169.70)	11.01		6,203.37
Dec-22	(0.00021)	4,734,570		(994.27)	9.59		5,218.69
Jan-23	(0.00021)	2,525,400		(530.34)	8.07		4,696.42
Feb-23	(0.00021)	4,442,129		(932.83)	6.56		3,770.15
Mar-23	(0.00021)	4,916,458		(1,032.46)	5.83		2,743.52
Apr-23	(0.00021)	4,115,229		(864.20)	4.10		1,883.42
May-23	(0.00021)	3,602,323		(756.49)	2.91		1,129.84
Jun-23	(0.00021)	2,807,034		(589.47)	1.69		542.06
Jul-23	(0.00021)	3,285,878		(690.02)	0.84		(147.12)
Aug-23	(0.00021)	3,342,906		(702.01)	(0.23)		(849.36)
Sep-23	(0.00021)	3,789,778		(795.86)	(1.27)		(1,646.49)
Oct-23	(0.00021)	4,735,260		(994.39)	(2.55)		(2,643.43)
				Transfer Balance from 20449		2,772.55	129.12
Nov-23	Prorated	4,672,463		(69.84)	0.54		59.82
Dec-23	0.00000	5,575,370		0.00	0.26		60.08
Jan-24	0.00000	6,230,202		0.00	0.26		60.34
Feb-24	0.00000	5,137,169		0.00	0.25		60.59
Mar-24	0.00000	5,572,876		0.00	0.26		60.85
Apr-24	0.00000	5,562,090		0.00	0.26		61.11
May-24	0.00000	5,131,249		0.00	0.27		61.38
Jun-24	0.00000	4,867,957		0.00	0.26		61.64

APPENDIX A

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Date	Grant Fund	CUB	Pre Match	Issue Fund	Order	Docket	Paid
1/11/2024		\$ 46,787.75			24-007	UM 2264	CUB
3/25/2024				\$ 25,776.35	24-080	LC 83	AWEC

APPENDIX B

Cascade Natural Gas Corporation

September 30, 2024

**NOTICE OF APPLICATION TO DEFER COSTS
FOR INTERVENOR FUNDING**

To All Parties Who Participated in UG-390

Please be advised that today, Cascade Natural Gas Corporation (“Cascade” or the “Company”) applied for reauthorization to defer intervenor funding. Copies of the Company’s application are available for inspection at the Company’s main office.

Parties who would like additional information or would like a copy of the filing, or notice of the time and place of any hearing, if scheduled, should contact the Company or the Public Utility Commission of Oregon as follows:

Cascade Natural Gas
Attn: Lori Blattner
8113 W Grandridge Blvd
Kennewick, WA 99336
208-377-6015
lori.blattner@intgas.com

Public Utility Commission of
Oregon Attn: Kathy Zarate
201 High Street SE, Suite 100
Salem, OR 97301-3398
971-375-5084
kathy.zarate@puc.oregon.gov

Any person may submit to the Commission written comments on the application no sooner than 25 days from the date of this notice.

The Company’s application will not authorize a change in rates, but will permit the Commission to consider allowing such deferred amount in rates in a subsequent proceeding.

APPENDIX B

Cascade Natural Gas Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this day served by electronic mail the foregoing NOTICE OF APPLICATION FOR REAUTHORIZAION TO DEFER INTERVENOR FUNDING upon all parties of record in UG-390, which is the Company's latest general rate case.

Oregon Citizens' Utility Board dockets@oregoncub.org	Michael Goetz Oregon Citizens' Utility Board mike@oregoncub.org
Tommy A Brooks Cable Huston LLP tbrooks@cablehuston.com	Chad M Stokes Cable Huston LLP cstokes@cablehuston.com
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William Gehrke Oregon Citizens' Utility Board will@oregoncub.com	

Dated this 30th day of September 2024.

/s/ Jacob Betterbed
Jacob Betterbed
Regulatory Analyst I
Cascade Natural Gas Corporation
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