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www.cngc.com

July 31, 2019

Oregon Public Utility Commission
201 High Street SE
P.O. Box 1088
Salem, OR 97308-1088

Re: UM 1336(12) – Reauthorization for Deferred Accounting Treatment of Intervenor Funding

Attn Filing Center:

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

Should you have any questions regarding this filing, please contact me at (509)734-4593.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Parvinen", is written over a horizontal line.

Michael Parvinen
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336-7166
michael.parvinen@cngc.com

Enclosures

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

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

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

8 This request is made in accordance with ORS 757.259(3) that allows for the deferral
9 of Intervenor funds, and Commission Order No. 18-017 Docket UM 1929, which directs
10 Cascade to pay to intervenors the amounts made available as defined and provided for in
11 the Agreement.

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

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

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

19 The table below shows the maximum amounts per the Agreement that may be
20 deferred during the 12-month period, November 1, 2019, through October 31, 2020:

Fund Type as Defined in Agreement	Maximum Amount
CUB Fund	\$39,500
Preauthorized Matching Fund	\$37,950
Issue Fund	\$34,500
Total	\$111,950

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1 **E. A Description and Explanation of the Entries in the Deferred Accounts – OAR 860-027-**
2 **0300(4)(a)**

3 Attached as Appendix A to this application are workpapers detailing the amounts
4 deferred to-date under UM 1336.

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

6 Attached as Appendix B is the copy of the Notice and the Certificate of Service
7 verifying the Notice was served on parties to the Company’s current general rate case,
8 UG-347.

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

10 The continuation of intervenor funds is justified per Commission Order No. 18-017
11 approving the terms of the Agreement.

12 **H. Requirements per Commission Order No. 09-263**

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

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

17 Appendix A includes the Summary Sheet, which shows the amounts deferred
18 and demonstrates the transfer of dollars from one account to another. Appendix A will
19 be attached to the Company’s electronic 2019-2020 PGA filing as a file entitled, “CNGC
20 Non-Gas Cost Deferral Amortization.xlsx.”

21 **2. The effective date of the deferral**

22 This application is for the 12-month period beginning November 1, 2019 and
23 ending October 31, 2020.

24 **3. Prior Year Order Number approving the deferral**

1 Authorization to defer costs in this docket was most recently granted per
2 Commission Order No. 18-332.

3 **4. The amount deferred last year**

	CUB Fund	NWIGU Fund
	<u>Acct 20444</u>	<u>Acct 20449</u>
Deferred amounts July 1, 2018, through June 30, 2019	\$70,541.20	\$41,338.25

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5 **5. The amount amortized last year**

	CUB Fund	NWIGU Fund
	<u>Acct 20443</u>	<u>Acct 20448</u>
Amortized amounts July 1, 2018, through June 30, 2019 with interest	\$43,919.20	\$11,125.17

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7 **6. The interest rate that will be applied to accounts**

8 The deferred balance accrues interest at the rate of 7.284%¹ through March
9 of 2019. Beginning of April 2019, deferred balance accrues interest at the rate of
10 7.270%². The amortized balance will accrue interest at the rate of 2.92% through
11 October 2019. Beginning November 2019, the amortized balance will accrue interest
12 at the rate of 3.74%³.

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

14 The Company estimates that it will not seek to defer more than \$111,950.
15 Cascade will seek to amortize the total deferral balance.

16 **III. COMMUNICATIONS**

¹ Authorized Rate of Return as approved in Commission Order No. 16-477 in docket No. UG-305.

² Authorized Rate of Return as approved in the Company's most recently concluded rate case, Commission Order No. 19-088 in docket No. UG-347.

³ Modified Blended Treasury (MBT) rates per annual staff calculation authorized in Dockets UM 1147 and UG 221.

1 Cascade hereby waives service by means of other than service by electronic mail. Consistent
2 with that waiver, communications regarding this Application should be addressed to all of the following:

3 Michael Parvinen
4 Cascade Natural Gas
5 8113 W. Grandridge Blvd
6 Kennewick, WA 99336
7 Email: michael.parvinen@cngc.com

Department of Regulatory Affairs
Cascade Natural Gas
8113 W. Grandridge Blvd
Kennewick, WA 99336
Email: CNGCregulatory@cngc.com

8 **IV. CONCLUSION**

9 Cascade requests that in accordance with ORS 757.259, the Commission authorize the Company
10 to defer the expenses described in this Application.

11 DATED: July 31, 2019

12 Sincerely,

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18 Michael Parvinen
19 Director, Cascade Natural Gas Corporation
20 8113 W. Grandridge Blvd
21 Kennewick, WA 99336
22 michael.parvinen@cngc.com

State:	Oregon	Appendix A
Description:	OR CUB Intervenor Funding Deferral	
Account number:	47OR.1860.20444	
Class of Customers:	Core: Rate schedule 101	
Deferral Period:	Annual	
Deferral Account Order:	11/1/18 to - 10/31/19	
Amortization Period:		
Narrative:	Oregon intervenor funding paid to the Citizens Utility Board of Oregon. Limited to \$34.5K deferral per calendar year.	

Month/Year	Rate	Therms	Deferral	Debit (Credit)		Adjustments	Deferred Balance
				Amortization	Interest		
				TRANSFER BALANCE TO 20443		(73,109.37)	15,146.78
Nov-16					92.97		15,239.75
Dec-16					96.66		15,336.41
Jan-17			39,750.00		97.27		55,183.68
Feb-17					316.14		55,499.82
Mar-17					343.34		55,843.16
Apr-17					334.32		56,177.48
May-17					347.54		56,525.02
Jun-17					338.41		56,863.43
Jul-17					351.78		57,215.21
Aug-17					353.96		57,569.17
Sep-17					344.66		57,913.83
Oct-17					358.28		58,272.11
				TRANSFER BALANCE TO 20443		(58,272.11)	0.00
Nov-17					0.00		0.00
Dec-17					0.00		0.00
Jan-18			39,500.00		0.00		39,500.00
Feb-18					220.72		39,720.72
Mar-18					245.73		39,966.45
Apr-18					239.27		40,205.72
May-18					248.73		40,454.45
Jun-18					242.19		40,696.64
Jul-18					251.77		40,948.41
Aug-18			2,000.00		253.32		43,201.73
Sep-18					258.64		43,460.37
Oct-18					268.86		43,729.23
				TRANSFER BALANCE TO 20443		(41,704.82)	2,024.41
Nov-18					12.12		2,036.53
Dec-18					12.60		2,049.13
Jan-19			39,500.00		12.68		41,561.81
Feb-19					232.24		41,794.05
Mar-19					258.56		42,052.61
Apr-19			27,388.00		251.28		69,691.89
May-19					430.31		70,122.20
Jun-19					419.00		70,541.20

State:	Oregon	Appendix A
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:	11/1/18 to 10/31/19	
Narrative:	This records consolidated deferral accounts for industrial intervenor funding	

Month/Year	Rate	Therms	Deferral	Debit (Credit)		Adjustments	Deferred Balance
				Amortization	Interest		
				TRANSFER BALANCE TO 20448		(51,061.78)	5,687.17
Nov-16					34.91		5,722.08
Dec-16			9,565.00		36.29		15,323.37
Jan-17			853.15		97.19		16,273.71
Feb-17					93.23		16,366.94
Mar-17					101.25		16,468.19
Apr-17			14,020.85		98.59		30,587.63
May-17					189.23		30,776.86
Jun-17					184.26		30,961.12
Jul-17					191.54		31,152.66
Aug-17					192.72		31,345.38
Sep-17					187.66		31,533.04
Oct-17					195.08		31,728.12
				TRANSFER BALANCE TO 20448		(31,728.12)	0.00
Nov-17					0.00		0.00
Dec-17					0.00		0.00
Jan-18			2,756.75		0.00		2,756.75
Feb-18					15.40		2,772.15
Mar-18					17.15		2,789.30
Apr-18					16.70		2,806.00
May-18					17.36		2,823.36
Jun-18					16.90		2,840.26
Jul-18					17.57		2,857.83
Aug-18					17.68		2,875.51
Sep-18					17.22		2,892.73
Oct-18			6,975.58		17.90		9,886.21
				TRANSFER BALANCE TO 20448		(2,910.63)	6,975.58
Nov-18					41.76		7,017.34
Dec-18					43.41		7,060.75
Jan-19					43.68		7,104.43
Feb-19					39.70		7,144.13
Mar-19					44.20		7,188.33
Apr-19			33,609.26		42.95		40,840.54
May-19					252.17		41,092.71
Jun-19					245.54		41,338.25

State:	Oregon	Appendix A
Description:	OR CUB Intervenor Funding	
Account number:	47OR.1860.20443	
Class of customers:	Core: Rate schedule 101	
Deferral period:	Annual	
Amortization period:	11/1/2018 through 10/31/2019	
Narrative:	Oregon intervenor funding paid to the Citizens Utility Board of Oregon. Limited to \$30K deferral per calendar year.	

<i>Debit (Credit)</i>							
Month/Year	Rate	Therms	Deferral	Amortization	Interest	Adjustments	Deferred Balance
Jan-16	(0.00099)	7,484,807	34,500.00	(7,409.96)	50.48	(34,500.00)	23,436.63
Feb-16	(0.00099)	5,858,066		(5,799.49)	35.94		17,673.08
Mar-16	(0.00099)	5,201,114		(5,149.10)	28.97		12,552.95
Apr-16	(0.00099)	3,605,420		(3,569.37)	19.91		9,003.49
May-16	(0.00099)	1,919,384		(1,900.19)	14.76		7,118.06
Jun-16	(0.00099)	1,682,515		(1,665.69)	11.29		5,463.66
Jul-16	(0.00099)	1,122,056		(1,110.84)	8.96		4,361.78
Aug-16	(0.00099)	946,520		(937.05)	7.15		3,431.88
Sep-16	(0.00099)	1,053,363		(1,042.83)	5.44		2,394.49
Oct-16	(0.00099)	1,728,611		(1,711.32)	3.92		687.09
				Transfer Balance to 20444		73,109.37	73,796.46
Nov-16	Prorated	2,826,682		(3,477.27)	133.44		70,452.63
Dec-16	(0.00186)	6,059,854		(11,271.33)	131.64		59,312.94
Jan-17	(0.00186)	9,594,883		(17,846.48)	110.83		41,577.29
Feb-17	(0.00186)	7,595,462		(14,127.56)	70.17		27,519.90
Mar-17	(0.00186)	6,661,590		(12,390.56)	51.42		15,180.76
Apr-17	(0.00186)	3,955,503		(7,357.24)	27.45		7,850.97
May-17	(0.00186)	3,345,704		(6,223.01)	14.67		1,642.63
Jun-17	(0.00186)	1,795,189		(3,339.05)	2.97		(1,693.45)
Jul-17	(0.00186)	1,000,924		(1,861.72)	(3.16)		(3,558.33)
Aug-17	(0.00186)	950,603		(1,768.12)	(6.65)		(5,333.10)
Sep-17	(0.00186)	854,296		(1,588.99)	(9.64)		(6,931.73)
Oct-17	(0.00186)	2,275,156		(4,231.79)	(12.95)		(11,176.47)
				Transfer Balance to 20444		58,272.11	47,095.64
Nov-17	Prorated	3,798,196		(6,094.87)	92.13		41,092.90
Dec-17	(0.00108)	6,111,528		(6,600.45)	83.06		34,575.51
Jan-18	(0.00108)	8,181,009		(8,835.49)	69.89		25,809.91
Feb-18	(0.00108)	5,567,397		(6,012.79)	47.12		19,844.24
Mar-18	(0.00108)	6,791,785		(7,335.13)	40.11		12,549.22
Apr-18	(0.00108)	4,645,914		(5,017.59)	24.55		7,556.18
May-18	(0.00108)	2,831,718		(3,058.26)	15.27		4,513.19
Jun-18	(0.00108)	1,463,528		(1,580.61)	8.83		2,941.41
Jul-18	(0.00108)	1,108,143		(1,196.79)	5.95		1,750.57
Aug-18	(0.00108)	963,653		(1,040.75)	3.54		713.36
Sep-18	(0.00108)	1,020,288		(1,101.91)	1.40		(387.15)
Oct-18	(0.00108)	2,155,861		(2,328.33)	(0.78)		(2,716.26)
				Transfer Balance to 20444		41,704.82	38,988.56
Nov-18	Prorated	3,510,105		(3,556.37)	93.57		35,525.76
Dec-18	(0.00088)	6,653,548		(5,855.12)	88.10		29,758.74
Jan-19	(0.00088)	7,738,415		(6,809.81)	73.80		23,022.73
Feb-19	(0.00088)	7,170,026		(6,309.62)	51.57		16,764.68
Mar-19	(0.00088)	8,099,998		(7,128.00)	41.58		9,678.26
Apr-19	(0.00088)	5,502,916		(4,842.57)	23.23		4,858.92
May-19	(0.00088)	2,820,144		(2,481.73)	12.05		2,389.24
Jun-19	(0.00088)	1,895,388		(1,667.94)	5.73		727.03

State:	Oregon	Appendix A
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:	11/01/2018 through 10/31/2019	
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.	

Month/Year	Rate	Therms	Deferral	Debit (Credit)		Adjustments	Deferred Balance
				Amortization	Interest		
Jan-16	(0.00006)	3,887,606		(233.26)	3.36		1,820.11
Feb-16	(0.00006)	3,463,630	34,283.50	(207.82)	2.79	(34,283.50)	1,615.08
Mar-16	(0.00006)	3,486,315	4,941.43	(209.18)	2.65	(4,941.43)	1,408.55
Apr-16	(0.00006)	3,344,304		(200.66)	2.23		1,210.12
May-16	(0.00006)	3,117,217		(187.03)	1.98		1,025.07
Jun-16	(0.00006)	3,085,946		(185.16)	1.63		841.54
Jul-16	(0.00006)	3,092,381	5,581.46	(185.54)	1.38	(5,581.46)	657.38
Aug-16	(0.00006)	3,088,624		(185.32)	1.08		473.14
Sep-16	(0.00006)	3,221,665		(193.30)	0.75		280.59
Oct-16	(0.00006)	3,632,518		(217.95)	0.46		63.10
				Transfer Balance to 20449		51,061.78	51,124.88
Nov-16	Prorated	3,304,728		(3,889.80)	92.44		47,327.52
Dec-16	(0.00128)	3,865,789		(4,948.21)	88.43		42,467.74
Jan-17	(0.00128)	4,296,028		(5,498.92)	79.35		37,048.17
Feb-17	(0.00128)	3,852,316		(4,930.96)	62.53		32,179.74
Mar-17	(0.00128)	3,832,564		(4,905.68)	60.13		27,334.19
Apr-17	(0.00128)	3,408,439		(4,362.81)	49.43		23,020.81
May-17	(0.00128)	3,368,720		(4,311.97)	43.01		18,751.85
Jun-17	(0.00128)	3,258,406		(4,170.75)	33.91		14,615.01
Jul-17	(0.00128)	3,210,866		(4,109.92)	27.31		10,532.40
Aug-17	(0.00128)	2,925,747		(3,744.96)	19.68		6,807.12
Sep-17	(0.00128)	3,269,371		(4,184.80)	12.31		2,634.63
Oct-17	(0.00128)	3,771,419		(4,827.42)	4.92		(2,187.87)
				Transfer Balance to 20449		31,728.12	29,540.25
Nov-17	Prorated	3,845,060		(2,914.92)	57.79		26,683.12
Dec-17	(0.00071)	3,761,576		(2,670.73)	53.94		24,066.33
Jan-18	(0.00071)	3,977,423		(2,823.97)	48.65		21,291.01
Feb-18	(0.00071)	3,128,805		(2,221.45)	38.87		19,108.43
Mar-18	(0.00071)	3,977,274		(2,823.87)	38.63		16,323.19
Apr-18	(0.00071)	3,229,034		(2,292.62)	31.93		14,062.50
May-18	(0.00071)	2,904,330		(2,062.08)	28.43		12,028.85
Jun-18	(0.00071)	3,131,813		(2,223.60)	23.53		9,828.78
Jul-18	(0.00071)	2,922,482		(2,074.95)	19.87		7,773.70
Aug-18	(0.00071)	2,794,718		(1,984.25)	15.71		5,805.16
Sep-18	(0.00071)	3,022,210		(2,145.77)	11.36		3,670.75
Oct-18	(0.00071)	3,624,540		(2,573.43)	7.42		1,104.74
				Transfer Balance to 20449		2,910.63	4,015.37
Nov-18	Prorated	3,409,116		(451.44)	9.64		3,573.57
Dec-18	(0.00008)	3,546,496		(283.71)	8.86		3,298.72
Jan-19	(0.00008)	3,787,317		(302.99)	8.18		3,003.91
Feb-19	(0.00008)	3,524,295		(281.95)	6.73		2,728.69
Mar-19	(0.00008)	3,914,447		(313.16)	6.77		2,422.30
Apr-19	(0.00008)	3,249,451		(259.96)	5.81		2,168.15
May-19	(0.00008)	3,561,925		(284.96)	5.38		1,888.57
Jun-19	(0.00008)	3,485,791		(278.86)	4.53		1,614.24

Appendix B

Cascade Natural Gas Corporation

July 31, 2019

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

To All Parties Who Participated in UG-347

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: Michael Parvinen
8113 W Grandridge Blvd
Kennewick, WA 99336
509-734-4593
CNGCregulatory@cngc.com

Public Utility Commission of Oregon
Attn: Marianne Gardner
201 High Street SE, Suite 100
Salem, OR 97301-3398

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-347, which was the Company's last general rate case.

Oregon Citizens' Utility Board dockets@oregoncub.org	Michael Goetz Oregon Citizens' Utility Board mike@oregoncub.org
Tommy A Brooks Cable Huston Benedict Haagensen & Lloyd tbrooks@cablehuston.com	Chad M Stokes Cable Huston Benedict Haagensen & Lloyd cstokes@cablehuston.com
Johanna Riemenschneider PUC Staff – Dept of Justice johanna.riemenschneider@doj.state.or.us	Edward Finklea Alliance of Western Energy Consumers efinklea@awec.solutions
John Jamieson Hermiston Generating Company LP jj.jamieson@perennialpower.net	Marianne Gardner Public Utility Commission of Oregon marianne.gardner@state.or.us
Jocelyn C Pease McDowell, Rackner & Gibson PC jocelyn@mrg-law.com	Lisa F Rackner McDowell, Rackner & Gibson PC dockets@mrg-law.com
Stephanie S Andrus PUC Staff – Dept of Justice Stephanie.andrus@state.or.us	William Gehrke Oregon Citizens' Utility Board will@oregoncub.com
Rates & Regulatory Affairs Northwest Natural efiling@nwnatural.com	Oregon Dockets Pacifcorp, dba Pacific Power oregondockets@pacifcorp.com
Matthew McVee Pacifcorp Matthew.mcvee@pacifcorp.com	

Dated this 31st day of July 2019.

/s/ Maryalice Peters
Maryalice Peters
Regulatory Analyst III
Cascade Natural Gas Corporation
8113 W Grandridge Blvd
Kennewick, WA 99336
Maryalice.peters@cngc.com