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July 31, 2023

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

Re: UM 1336(16) – 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](mailto: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

1

**I. INTRODUCTION**

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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, 2023 and ending October 31, 2024.

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8 In support of this application, Cascade provides the following:

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**II. APPLICATION FOR REAUTHORIZATION TO DEFER**

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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:

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

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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, 2023, through October 31, 2024, 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

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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. 22-506 Docket UM 2264, 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, 2023, through October 31, 2024:

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

<b>Total</b>	<b>\$130,313</b>
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2 **E. A Description and Explanation of the Entries in the Deferred Accounts – OAR 860-027-**  
3 **0300(4)(a)**

4 Attached as Appendix A to this application are workpapers detailing the amounts  
5 deferred to-date under UM 1336. Also attached to Appendix A is a list of year 2023 intervenor  
6 payments by date, Order and Docket number, and whom it was paid to.

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

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

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

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

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

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

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

19 Appendix A includes the Summary Sheet, which shows the amounts deferred  
20 and demonstrates the transfer of dollars from one account to another. Appendix A will  
21 be attached to the Company’s electronic 2023-2024 PGA filing as a file entitled, “UG  
22 463, UG 464, UG 465, UG 466 CNGC Gas & Non Gas Cost Model WP 7.28.23.xlsx.”

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

1 This application is for the 12-month period beginning November 1, 2023 and  
2 ending October 31, 2024.

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

4 Authorization to defer costs in this docket was most recently granted per  
5 Commission Order No. 22-397.

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

	<b>CUB Fund</b>	<b>AWEC Fund</b>
	<u>Acct 20444</u>	<u>Acct 20449</u>
Deferred amounts July 1, 2022, through June 30, 2023	\$50,669.02	\$2,707.46

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

	<b>CUB Fund</b>	<b>AWEC Fund</b>
	<u>Acct 20443</u>	<u>Acct 20448</u>
Amortized amounts July 1, 2022, through June 30, 2023 with interest	(\$47,908.57)	(\$20,105.18)

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

11 The deferred balance accrues interest at the rate of 7.071%<sup>1</sup>. The amortized  
12 balance will accrue interest at the rate of 1.82% through October 2023. Beginning  
13 November 2023, the amortized balance will accrue interest at the rate of 5.13%<sup>2</sup>.

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

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

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<sup>1</sup> 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.

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

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**III. COMMUNICATIONS**

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

Lori Blattner  
Cascade Natural Gas  
8113 W. Grandridge Blvd  
Kennewick, WA 99336  
Email: [lori.blattner@intgas.com](mailto:lori.blattner@intgas.com)

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

**IV. CONCLUSION**

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.

DATED: July 31, 2023

Sincerely,  
  
/s/Lori A. Blattner  
  
\_\_\_\_\_  
Lori A. Blattner  
Director, Cascade Natural Gas Corporation  
8113 W. Grandridge Blvd  
Kennewick, WA 99336  
[lori.blattner@intgas.com](mailto: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:	11/1/22 to - 10/31/23
Amortization Period:	
Narrative:	Oregon intervenor funding paid to the Citizens Utility Board of Oregon. Limited to \$34.5K deferral per calendar year.

*Debit (Credit)*

Month/Year	Rate	Therms	Deferral	Amortization	Interest	Adjustments	Deferred Balance
				TRANSFER BALANCE TO 20443		(53,862.35)	(0.01)
Nov-20			11,100.00		0.00		11,099.99
Dec-20			664.00		68.54		11,832.53
Jan-21			39,500.00		73.06		51,405.59
Feb-21			0.00		278.84		51,684.43
Mar-21			0.00		310.39		51,994.82
Apr-21			0.00		302.18		52,297.00
May-21			0.00		314.07		52,611.07
Jun-21			0.00		305.76		52,916.83
Jul-21			0.00		317.79		53,234.62
Aug-21			0.00		319.70		53,554.32
Sep-21			0.00		311.25		53,865.57
Oct-21			0.00		323.49		54,189.06
				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

## APPENDIX A

State:	Oregon
	OR 11/01/12 Consolidated Accounts: Non Gas Cost Related PGA Temporary Rate Increments
Description:	UM1336 Industrial Intervenor Funding
Account number:	47OR.1860.20449
Class of Customers:	105, 111, 170, 163, 164
Deferral Period:	Annual
Deferral Account Order:	11/1/22 to 10/31/23
Amortization Period:	
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		(32,198.94)	6,992.51
Nov-20			21,711.00		41.78		28,745.29
Dec-20			0.00		177.49		28,922.78
Jan-21			0.00		178.58		29,101.36
Feb-21			0.00		157.86		29,259.22
Mar-21			0.00		175.72		29,434.94
Apr-21			9,470.66		171.07		39,076.67
May-21			0.00		234.68		39,311.35
Jun-21			0.00		228.47		39,539.82
Jul-21			0.00		237.46		39,777.28
Aug-21			0.00		238.88		40,016.16
Sep-21			0.00		232.57		40,248.73
Oct-21			0.00		241.71		40,490.44
				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



## 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:	11/1/2022 through 10/31/2023
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		53,862.35	52,270.29
Nov-20	Prorated	3,998,049		(5,333.53)	112.99		47,049.75
Dec-20	(0.00107)	7,365,412		(7,880.99)	105.09		39,273.85
Jan-21	(0.00107)	7,851,363		(8,400.96)	87.73		30,960.62
Feb-21	(0.00107)	7,108,078		(7,605.64)	62.46		23,417.44
Mar-21	(0.00107)	7,124,199		(7,622.89)	52.31		15,846.86
Apr-21	(0.00107)	5,037,896		(5,390.55)	34.26		10,490.57
May-21	(0.00107)	2,715,943		(2,906.06)	23.43		7,607.94
Jun-21	(0.00107)	2,108,811		(2,256.43)	16.45		5,367.96
Jul-21	(0.00107)	1,157,465		(1,238.49)	11.99		4,141.46
Aug-21	(0.00107)	985,598		(1,054.59)	9.25		3,096.12
Sep-21	(0.00107)	1,164,801		(1,246.34)	6.69		1,856.47
Oct-21	(0.00107)	2,037,675		(2,180.31)	4.15		(319.69)
				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

## 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:	11/01/2022 through 10/31/2023
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		32,198.94	29,859.84
Nov-20	Prorated	3,702,208		(2,693.25)	64.55		27,231.14
Dec-20	(0.00069)	4,443,477		(3,066.00)	60.83		24,225.97
Jan-21	(0.00069)	4,362,509		(3,010.14)	54.11		21,269.94
Feb-21	(0.00069)	4,045,975		(2,791.74)	42.91		18,521.11
Mar-21	(0.00069)	4,096,964		(2,826.90)	41.37		15,735.58
Apr-21	(0.00069)	3,755,249		(2,591.12)	34.01		13,178.47
May-21	(0.00069)	3,296,000		(2,274.24)	29.44		10,933.67
Jun-21	(0.00069)	3,112,464		(2,147.59)	23.63		8,809.71
Jul-21	(0.00069)	3,131,668		(2,160.86)	19.68		6,668.53
Aug-21	(0.00069)	3,018,904		(2,083.04)	14.90		4,600.39
Sep-21	(0.00069)	3,241,413		(2,236.58)	9.94		2,373.75
Oct-21	(0.00069)	3,863,893		(2,666.08)	5.30		(287.03)
				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

## APPENDIX A

### AWEC/CUB

<b>Date</b>	<b>Grant Fund</b>	<b>CUB</b>	<b>Pre Match</b>	<b>Issue Fund</b>	<b>Order</b>	<b>Docket</b>	<b>Paid</b>
1/25/2022		\$ 39,500.00			22-014	UM 1929	CUB
5/4/2022			\$ 1,409.20		22-153	UM 1929	AWEC
10/28/2022			\$ 2,598.82		22-417	UM 1929	AWEC
11/16/2022				\$ 4,286.00	22-449	UM 2178	CUB
3/15/2023		\$ 45,425.00			23-090	UM 2264	CUB

APPENDIX B

**Cascade Natural Gas Corporation**

July 31, 2023

**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](mailto:lori.blattner@intgas.com)

Public Utility Commission of Oregon  
Attn: Ishraq Ahmed  
201 High Street SE, Suite 100  
Salem, OR 97301-3398  
971-208-0850  
[Ishraq.ahmed@puc.oregon.gov](mailto:Ishraq.ahmed@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
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Dated this 31st day of July 2023.

/s/ Jacob Betterbed  
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