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July 30, 2010

Ms. Vikie Bailey-Goggins  
Oregon Public Utility Commission  
550 Capitol Street NE #215  
Salem, OR 97308-2148

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

Dear Ms. Bailey-Goggins:

Cascade Natural Gas Corporation files the enclosed Application for Reauthorization of the Deferred Accounting Treatment of Intervenor Funding Grants for the upcoming 12-months effective with the date of this filing. Initial authorization was approved in Docket UM 1336, Order No. 07-397, with an effective date of September 13, 2007.

Should you have any questions regarding this filing, please contact Katherine Barnard at (206) 381-6824.

Sincerely,

Jon T. Stoltz  
Sr. Vice President  
Regulatory & Gas Supply

Enclosures

*“In The Community To Serve”*

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **DOCKET NO. 1336**

4  
5 In the Matter of the Application of  
6 **CASCADE NATURAL GAS CORPORATION**  
7 for Reauthorization to Defer Expenses for  
8 Intervenor Funding Grants

**APPLICATION**

9 In accordance with ORS 757.259 and OAR 860-027-0300, Cascade Natural Gas  
10 Corporation (or the "Company") applies to the Public Utility Commission of Oregon  
11 ("Commission") for an accounting order reauthorizing the Company to record and defer, on an  
12 ongoing basis, the cost of intervenor funding grants provided to qualifying organizations  
13 pursuant to the provisions of ORS 757.259 (3), as amended by Or Laws 2003, ch 234  
14 ("Intervenor Funding Grants). The Company respectfully requests that the deferral commence as  
15 of the date of this filing, for later amortization in rates.

16 In support of this Application, Casacade states:

17 1. **CASCADE NATURAL GAS CORPORATION**

18 Cascade Natural Gas Corporation is a public utility engaged in the distribution of  
19 natural gas in the states of Oregon and Washington and is subject to the jurisdiction of the  
20 Commission with regard to its rates, service and accounting practices.

21 2. **STATUTORY AUTHORITY**

22 This Application is filed pursuant to ORS 757.259, which empowers the  
23 Commission to authorize the deferral of expenses or revenues of a public utility for later  
24 incorporation in rates.  
25  
26

1           **3.       COMMUNICATIONS**

2           Communications regarding this Application should be addressed to:

3           Kathie Barnard  
4           Manager, Regulatory & Gas Supply  
5           Cascade Natural Gas Corporation  
6           222 Fairview Avenue North  
7           Seattle, WA 98109  
8           Telephone: (206) 381-6824  
9           E-mail: kathie.barnard@cngc.com

10           **4.       BASIS FOR APPLICATION**

11           Statutory Authority

12           On June 6, 2003, the Governor signed Or Laws 2003, ch 234 (the “Intervenor  
13           Funding Act”) into law. Section 2 of the intervenor Funding Act authorizes the  
14           Commission to approve written agreements for intervenor funding grants between  
15           electric and natural gas utilities and qualifying organizations representing broad customer  
16           interests. Such grants would be used by these qualifying organizations when  
17           participating in certain types of regulatory proceedings before the Commission. Section  
18           2 of the intervenor funding act also authorizes the Commission to establish rules with  
19           respect to funding agreements for determining which organizations are eligible for  
20           financial assistance, the amount of assistance that may be provided, the manner in which  
21           assistance will be distributed, and other necessary administrative matters.

22           Moreover, Section 2 of the Intervenor Funding Act provides:

23                           “The commission shall allow a public utility that  
24                           provides financial assistance under this section to recover  
25                           the amounts so provided in rates. The commission shall  
26                           allow a public utility to defer inclusion of those amounts in  
                              rates as provided in ORS 757.259 if the public utility so  
                              elects.”

1           ORS 757.259(3), as amended by section 3 of the Intervenor Funding Act,  
2           provides:

3                           “Upon request of the public utility, the commission  
4                           by order shall allow deferral of amounts provided as  
5                           financial assistance under an agreement entered into under  
6                           section 2 of this 2003 Act for later incorporation in rates.”

6           Additionally, the Company notes that deferred amounts under ORS 757.259(3)  
7           are not subject to the percentage of gross revenues limitation on amortization or other  
8           provisions of subsections (5), (6), (7), and (8) of the amended section.

9                           Commission Approval of the Intervenor Funding Agreement

10           On December 19, 2007, the Commission issued Order No. 07-564, which  
11           approved amendments to the original Intervenor Funding Agreement previously  
12           approved in Order No. 03-338. The parties to this amended Intervenor Funding  
13           Agreement are Portland General Electric Company, PacifiCorp, Cascade Natural Gas  
14           Corporation, Avista Corporation, Industrial Customers of Northwest Utilities (ICNU),  
15           Citizens’ Utility Board of Oregon (CUB), and Northwest Industrial Gas Uses (NWIGU).  
16           The Intervenor Funding Agreement sets forth the amount of funding to be contributed by  
17           each utility and the procedures for budget submittals by intervenors, Commission  
18           approval of budgets, and the payment of grants by utilities. In its subsequent Order No.  
19           08-006, the Commission directed the utilities to pay to CUB the amounts made available  
20           for the CUB Fund Grants as defined and provided for in the Intervenor Funding  
21           Agreement (\$30,000 for Cascade). Express Commission approval for payment was  
22           necessitated by Section 7.1 of the Intervenor Funding Agreement, which provides that  
23           “upon request by CUB, the Commission will direct the Participating Public Utilities to  
24           pay the amounts made available for CUB Fund Grants...”

1           **5.       CASCADE PROPOSAL**

2           In accordance with the statutory authority provided by ORS 757.259(3), as  
3           amended, and the Commission’s approval of the Intervenor Funding Agreement, Cascade  
4           proposes to record and defer, on an ongoing basis, any and all Intervenor Funding Grants  
5           as defined and provided for in the Intervenor Funding Agreement, for later incorporation  
6           in rates. The Company will record and defer these ongoing costs upon payment of the  
7           Intervenor Funding Grants following the Commission’s approval of the Intervenor  
8           Funding Grant and issuance of an Order directing the Company to make payment,  
9           pursuant to the intervenor Funding Agreement.

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

13           **6.       AMOUNTS SUBJECT TO DEFERRAL**

14           Cascade anticipates that the maximum amounts to be deferred during the 12-  
15           month period subsequent to the Application are:

<u>Fund</u>	
CUB Fund	\$ 30,000
Preauthorized Matching Fund	\$ 30,000
Issue Fund	<u>\$ 30,000</u>
Total	<u>\$ 90,000</u>

21  
22           For the 12-month period covered by this Application, Cascade expects that the  
23           amount subject to this deferral will not exceed \$ 90,000. The Intervenor Funding  
24           Agreement permits under certain circumstances for an advance of funds that would  
25           otherwise be available in future years for Intervenor Funding Grants from the CUB Fund  
26           and the Preauthorized Matching Fund. If an advance is made under the applicable


1 provision of the Intervenor Funding Agreement, the maximum annual amounts of  
2 Intervenor Funding Grants from the CUB Fund or the Preauthorized Grant Fund could  
3 exceed the level specified in this paragraph in which case the amount deferred under this  
4 Application could exceed \$ 90,000.

5  
6 **7. ACCOUNTING**

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

12 WHEREFORE, Cascade respectfully requests that in accordance with ORS 757.259(3),  
13 as amended, the Commission issue an order reauthorizing the Company to record and defer, on  
14 an ongoing basis and commencing as of the date of this filing, Intervenor Funding Grants  
15 incurred by the Company pursuant to the Intervenor Funding Agreement, as described in this  
16 Application.

17 DATED: July 30, 2010.

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19  
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21 \_\_\_\_\_  
22 Jon T. Stoltz  
23 Sr. Vice President  
24 Regulatory & Gas Supply  
25 Cascade Natural Gas Corporation  
26 222 Fairview Avenue North  
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**CERTIFICATE OF SERVICE**

I certify that I have this day served the foregoing NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER EXPENSES FOR INTERVENOR FUNDING GRANTS upon all parties of record in the (UM 1283) proceeding, by emailing an electronic copy to the following parties or attorneys of parties:

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DATED at Seattle, Washington, this 30<sup>th</sup> day of July, 2010.

          /s/ Katherine Barnard            
Katherine Barnard  
Regulatory Affairs  
Cascade Natural Gas Corporation