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August 30, 2022

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

Re: UM 1558 - Reauthorization for Deferred Accounting Treatment of Gas Costs

Attention: Filing Center

Cascade Natural Gas Corporation (Cascade or the Company) submits the attached Application for Reauthorization to defer gas costs consistent with the parameters established in Schedule 177, Purchased Gas Adjustment Provision.

If there are any questions regarding this filing, 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

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**  
3 **UM 1558**  
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6  
7 In the Matter of  
8 Cascade Natural Gas Corporation  
9 For Reauthorization to Defer  
10 Gas Costs  
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APPLICATION FOR  
REAUTHORIZATION FOR  
DEFERRED ACCOUNTING

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14  
15 **I. INTRODUCTION**

16 In accordance with ORS 757.259 and OAR 860-027-0300(4), Cascade Natural Gas Corporation  
17 (“Cascade” or the “Company”) files this application (“Application”) with the Public Utility Commission of  
18 Oregon (“Commission”) for an order reauthorizing the Company to record and defer with interest the  
19 difference between actual and embedded commodity and non-commodity costs, in accordance with the  
20 parameters established in the Company’s Schedule 177, Purchased Gas Adjustment Provision, for the  
21 twelve month period beginning November 1, 2022, and ending October 31, 2023

22 **II. APPLICATION FOR REAUTHORIZATION TO DEFER**

23 In compliance with the requirements established in OAR 860-027-0300(3) and (4), and  
24 Commission Order No 09-263, Cascade submits the following:

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

26 Cascade requests reauthorization to continue deferring gas cost differences as set forth  
27 currently in Purchase Gas Cost Adjustment (PGA) Provision Schedule No. 177. Such differences  
28 have been accumulated in subaccounts of Account No. 191 for distribution to or collection from  
29 customers at a later date consistent with the established PGA methodology. Gas cost differences  
30 will be separated between demand-related cost differences and commodity-related cost  
31 differences.

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

2 Deferring gas costs is appropriate for the same reasons that originally established  
3 the PGA mechanism in Order 89-1046: minimizing both the frequency of rate changes and  
4 the fluctuation of rate levels consistent with the authority granted the Commission in ORS  
5 757.259(2)(e).

6 Due to the volatility of the price of gas purchased for customer use, the associated  
7 costs are difficult to establish with any degree of certainty. This volatility makes the use of  
8 deferral accounting necessary.

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

10 Absent the approval of deferral accounting, the charges incurred for gas costs and  
11 other associated costs would be recorded as increases/decreases in the appropriate 800 gas  
12 expense sub-account.

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

14 Because of market fluctuations, it is impossible to estimate with any accuracy the  
15 amount that would be recorded in the deferral accounts during the 12-month period.  
16 Appendix A to this filing provides a description and explanation for the anticipated entries  
17 into the deferred accounts. Reauthorization of the continuation of deferred accounting  
18 treatment for gas cost differences is justified as they are continuing in nature.

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

20 Attached as Appendix B is the copy of the notice and the certificate of service verifying  
21 the notice was served on parties to the Company’s most recent general rate case, UG-390.

22 **F. A Description and Explanation of the Entries in the Deferred Accounts – OAR 860-027-**  
23 **0300(4)(a)**

1 Please see the response under II (A) above as well as Appendix A.

2 **G. The Reason for Continuation of Deferred Accounting – OAR 860-027-030(4)(b)**

3 The continuation of the deferred accounting of gas costs is justified as these costs are  
4 continuing in nature.

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

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

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

10 Appendix A includes the Summary Sheet, which shows the amounts deferred  
11 and demonstrates the transfer of dollars from one account to another. Appendix A was  
12 attached to the Company’s electronic 2022-2023 PGA filing as a file entitled, “UG 442  
13 UG 443 UG 444 UG 445 CNGC Gas & Non Gas Cost Model WP 7.29.22.xlsx.”

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

15 This application is for the 12-month period beginning November 1, 2022 and  
16 ending October 31, 2023.

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

18 Authorization to defer costs was most recently granted per Commission Order  
19 No. 21-387, issued on November 3, 2021.

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

21

	<b>Commodity</b>	<b>Demand</b>
	<u>Acct 01272</u>	<u>Acct 01273</u>
22 23 24 Deferral balances through July 31, 2022	\$12,095,994.58	\$744,803.97

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

	<b>Consolidated</b>
	<u>Acct 01287</u>
Amortized amounts with interest from November 1, 2021, through July 31, 2022	(\$2,991,989.88)

2  
3           **6.       The interest rate that will be applied to accounts**

4                       The deferred balance accrues interest at the rate of 7.071%<sup>1</sup>. The amortized  
5                       balance will accrue interest at the rate of 1.24% through October 2022. Beginning  
6                       November 2022, the amortized balance will accrue interest at the rate of 1.82%<sup>2</sup>.

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

8                       Cascade is unable to estimate the amount it will defer during the next PGA  
9                       cycle. The Company’s intent is to amortize the total amount it defers.

10                      **III.       COMMUNICATIONS**

11                      Cascade hereby waives service by means of other than service by electronic mail. Consistent  
12                      with that waiver, please address communications regarding this Application to all of the following:

13           Lori A. Blattner	Department of Regulatory Affairs
14           Cascade Natural Gas	Cascade Natural Gas
15           8113 W. Grandridge Blvd	8113 W. Grandridge Blvd
16           Kennewick, WA 99336	Kennewick, WA 99336
17           Email: <a href="mailto:lori.blattner@intgas.com">lori.blattner@intgas.com</a>	Email: <a href="mailto:CNGCregulatory@cngc.com">CNGCregulatory@cngc.com</a>

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19                      **IV.       CONCLUSION**

20                      Cascade requests that in accordance with ORS 757.259 and OAR 860-027-0300(4), the  
21                      Commission authorize the Company to defer the expenses described in this Application.

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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.

DATED: August 30, 2022

Sincerely,



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

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## Appendix A

State:	Oregon
Description:	Core Market Commodity Costs
Account number:	47OR.1910.01272 (Previously 47OR.2530.01272)
Class of Customers:	Core
Deferral Period:	11/1/2021 to 10/31/2022
Deferral Account Order:	N/A
Amortization Period:	N/A
Narrative:	Deferral of 90% of the difference between core commodity gas costs actually incurred and the average monthly base commodity gas cost as defined in rate schedule 177-A.

### 3rd Party Damage

*Debit (Credit)*

Month/Year	Rate	Therms	Deferral	Amortization	Interest	Adjustments	Deferred Balance
						TRANSFER BALANCE TO 01287	(8,813,365.36) 996,436.47
Nov-19			629,258.85		5,954.05	(40.15)	1,631,609.22
Dec-19			1,745,820.30		10,074.40	(117.76)	3,387,386.16
Jan-20			1,183,955.34		20,915.49		4,592,256.99
Feb-20			485,540.29		26,525.63	(2,206.38)	5,102,116.53
Mar-20			50,224.29		31,503.12		5,183,843.94
Apr-20			(96,094.41)		30,975.24	(1,595.31)	5,117,129.46
May-20			(72,959.31)		31,595.82		5,075,765.97
Jun-20			(26,290.95)		30,329.44	(751.88)	5,079,052.58
Jul-20			(5,652.06)		31,360.71	(3,436.18)	5,101,325.05
Aug-20			(12,715.48)		31,498.24	(819.53)	5,119,288.28
Sep-20			85,768.45		30,589.50		5,235,646.23
Oct-20			(268,607.42)		32,327.61	(3,252.51)	4,996,113.91
						TRANSFER BALANCE TO 01287	(5,204,631.56) (208,517.65)
Nov-20			224,258.28		(1,245.96)		14,494.67
Dec-20			878,541.08		89.50	(56.20)	893,069.05
Jan-21			647,905.73		5,514.27	(250.09)	1,546,238.96
Feb-21			456,378.82		8,387.31	(361.36)	2,010,643.73
Mar-21			369,026.95		12,074.93	(84,659.91)	2,307,085.70
Apr-21			136,304.26		13,408.28	(395.79)	2,456,402.45
May-21			214,081.92		14,751.94	(2,200.63)	2,683,035.68
Jun-21			145,358.58		15,593.22	(56.20)	2,843,931.28
Jul-21			(17,843.89)		17,079.25	(1,614.81)	2,841,551.83
Aug-21			289,712.23		17,064.96	(1,525.58)	3,146,803.44
Sep-21			317,899.99		18,288.53	(568.96)	3,482,423.00
Oct-21			917,314.23		20,913.72	(1,172.29)	4,419,478.66
						TRANSFER BALANCE TO 01287	(2,912,305.23) 1,507,173.43
Nov-21			908,273.31		8,759.36	(340.75)	2,423,865.35
Dec-21			1,966,307.94		14,556.54	1,087.51	4,405,817.34
Jan-22			1,966,424.86		26,459.17	(3,179.73)	6,395,521.64
Feb-22			1,261,460.37		34,691.41	(238.11)	7,691,435.31
Mar-22			776,404.76		46,190.97	(271.39)	8,513,759.65
Apr-22			1,174,416.04		49,480.11	(1,297.27)	9,736,358.53
May-22			1,066,349.21		58,471.77	(10,859.77)	10,850,319.74
Jun-22			852,363.97		63,059.68	(928.22)	11,764,815.17
Jul-22			260,494.28		70,653.68	(18.55)	12,095,944.58

## Appendix A

State:	Oregon
Description:	Core Market Demand & Gas Storage Mitigation Costs
Account number:	47OR.1910.01273 (Previously 47OR.2530.01273)
Class of Customers:	Core
Deferral Period:	11/1/2021 to 10/31/2022
Deferral Account Order:	N/A
Amortization Period:	N/A
Narrative:	This records the deferral of the differences between core demand costs actually incurred and the embedded demand costs collected in the tariffs as well as the Tenaska capacity reservation and gas storage mitigation costs based on therms.

*Debit (Credit)*

Month/Year	Rate	Therms	Deferral	Amortization	Interest	Adjustments	Deferred Balance
				TRANSFER BALANCE TO 01287		3,816,762.48	(1,382,348.34)
Nov-19			(345,218.73)		(8,260.00)	(6,718.25)	(1,742,545.32)
Dec-19			(569,084.51)		(10,759.38)		(2,322,389.21)
Jan-20			(688,931.13)		(14,339.64)		(3,025,659.98)
Feb-20			(369,456.87)		(17,476.71)		(3,412,593.56)
Mar-20			(160,147.35)		(21,071.13)		(3,593,812.04)
Apr-20			343,189.60		(21,474.26)		(3,272,096.70)
May-20			294,823.06		(20,203.63)		(2,997,477.27)
Jun-20			348,276.13		(17,910.95)		(2,667,112.09)
Jul-20			483,466.96		(16,468.14)		(2,200,113.27)
Aug-20			449,521.30		(13,584.64)		(1,764,176.61)
Sep-20			411,280.68		(10,541.56)		(1,363,437.49)
Oct-20			(59,156.45)		(8,418.57)		(1,431,012.51)
				TRANSFER BALANCE TO 01287		2,733,056.12	1,302,043.61
Nov-20			(227,867.26)		7,780.16		1,081,956.51
Dec-20			(617,074.10)		6,680.56		471,562.97
Jan-21			(449,391.46)		2,911.68		25,083.19
Feb-21			(498,475.74)		136.06		(473,256.49)
Mar-21			61,661.27		(2,842.15)		(414,437.37)
Apr-21			439,662.27		(2,408.62)		22,816.28
May-21			231,576.79		137.02		254,530.09
Jun-21			475,166.41		1,479.27		731,175.77
Jul-21			459,622.50		4,391.08		1,195,189.35
Aug-21			557,250.94		7,177.72		1,759,618.01
Sep-21			394,164.46		10,226.51		2,164,008.98
Oct-21			10,014.13		12,995.97		2,187,019.08
				TRANSFER BALANCE TO 01287		(578,516.17)	1,608,502.91
Nov-21			(126,153.29)		9,348.27		1,491,697.89
Dec-21			(731,689.54)		8,958.40		768,966.75
Jan-22			(706,206.44)		4,618.04		67,378.35
Feb-22			(378,823.17)		365.48		(311,079.34)
Mar-22			(35,061.96)		(1,868.19)		(348,009.49)
Apr-22			101,038.20		(2,022.55)		(248,993.84)
May-22			(7,673.58)		(1,495.33)		(258,162.75)
Jun-22			381,148.41		(1,500.39)		121,485.27
Jul-22			622,589.12		729.58		744,803.97



## Appendix A

State:	Oregon
Description:	OR 11/01/16 Consolidated Accounts: Gas Cost Related PGA Temporary Rate Increments
Account number:	47OR.1910.01287 (Previously 47OR.2530.01287)
Class of Customers:	Core
Deferral Period:	N/A
Deferral Account Order:	N/A
Amortization Period:	11/1/2021 through 10/31/2022
Narrative:	This records the consolidated deferral accounts corresponding to the temporary technical adjustments included in the PGA tracker effective 11/1/2016 that are incorporated into the customers' per therm gas rates. (Schedule 191)

*Debit (Credit)*

Month/Year	Rate	Therms	Deferral	Amortization	Interest	Adjustments	Deferred Balance
<b>Transfer Balance from 01272 &amp; 01273</b>						4,996,602.88	5,250,375.11
Nov-19	Prorated	8,390,001		(32,464.58)	16,139.51		5,234,050.04
Dec-19	(0.064003)	11,928,170		(763,438.67)	16,625.64		4,487,237.01
Jan-20	(0.064003)	14,596,060		(934,191.64)	14,253.43		3,567,298.80
Feb-20	(0.064003)	11,491,915		(735,517.04)	10,600.25		2,842,382.01
Mar-20	(0.064003)	11,204,797		(717,140.62)	9,028.65		2,134,270.04
Apr-20	(0.064003)	8,957,499		(573,306.81)	6,560.69		1,567,523.92
May-20	(0.064003)	4,626,764		(296,126.78)	4,979.14		1,276,376.28
Jun-20	(0.064003)	3,701,612		(236,914.26)	3,923.55		1,043,385.57
Jul-20	(0.064003)	2,795,146		(178,897.72)	3,314.25		867,802.10
Aug-20	(0.064003)	2,080,154		(133,136.09)	2,756.52		737,422.53
Sep-20	(0.064003)	2,356,318		(150,811.42)	2,266.82		588,877.93
Oct-20	(0.064003)	3,372,125		(215,826.11)	1,870.53		374,922.35
<b>Transfer Balance from 01272 &amp; 01273</b>						2,374,475.98	2,749,398.33
Nov-20	Prorated	7,238,161		(362,958.08)	5,943.22		2,392,383.47
Dec-20	(0.030990)	13,037,539		(404,033.35)	5,343.86		1,993,693.98
Jan-21	(0.030990)	13,574,064		(420,660.24)	4,453.31		1,577,487.05
Feb-21	(0.030990)	12,423,340		(384,999.31)	3,182.63		1,195,670.37
Mar-21	(0.030990)	12,589,069		(390,135.25)	2,670.77		808,205.89
Apr-21	(0.030990)	8,966,512		(277,872.20)	1,747.05		532,080.74
May-21	(0.030990)	5,048,877		(156,464.70)	1,188.51		376,804.55
Jun-21	(0.030990)	4,051,800		(125,565.28)	814.52		252,053.79
Jul-21	(0.030990)	2,377,245		(73,670.82)	563.01		178,945.98
Aug-21	(0.030990)	2,149,915		(66,625.86)	399.71		112,719.83
Sep-21	(0.030990)	2,552,826		(79,112.07)	243.66		33,851.42
Oct-21	(0.030990)	3,985,417		(123,508.07)	75.61		(89,581.04)
<b>Transfer Balance from 01272 &amp; 01273</b>						3,490,821.40	3,401,240.36
Nov-21	Prorated	6,845,996		(224,260.58)	3,466.47		3,180,446.25
Dec-21	(0.036110)	10,699,667		(386,364.97)	3,349.49		2,797,430.77
Jan-22	(0.036110)	16,047,471		(579,474.18)	2,946.12		2,220,902.71
Feb-22	(0.036110)	12,735,651		(459,884.35)	2,112.60		1,763,130.96
Mar-22	(0.036110)	12,890,793		(465,486.54)	1,856.84		1,299,501.26
Apr-22	(0.036110)	8,594,412		(310,344.22)	1,324.42		990,481.46
May-22	(0.036110)	7,579,423		(273,692.96)	1,043.13		717,831.63
Jun-22	(0.036110)	5,059,028		(182,681.50)	731.60		535,881.73
Jul-22	(0.036110)	2,756,811		(127,195.61)	564.36		409,250.48

**Appendix B**

**Cascade Natural Gas Corporation**

August 30, 2022

**NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER GAS COSTS**

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 gas costs. 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: Brian Fjeldheim  
201 High Street SE, Suite 100  
Salem, OR 97301-3398  
971-375-5084  
[brian.m.fjeldheim@puc.oregon.gov](mailto:brian.m.fjeldheim@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 GAS COSTS upon all parties of record in UG-390, which is the Company's most recent 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 August 2022.

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