ITEM NO. 5 & 6

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: October 19, 2015

REGULAR __X__ **CONSENT** ____ **EFFECTIVE DATE** __**November 1, 2015**__

DATE: October 5, 2015

TO: Public Utility Commission

FROM: Erik Colville

THROUGH: Jason Eisdorfer and Aster Adams

SUBJECT: CASCADE NATURAL GAS: (Docket No. UG 299/Advice No. O15-07-01) Reflects changes in the cost of purchased gas and the amortization rate for the Purchased Gas Adjustment (PGA) balancing account.

CASCADE NATURAL GAS: (Docket No. UG 303/Advice No. O15-07-05) Revises multiple schedules reflecting changes resulting from annual updates.

STAFF RECOMMENDATION:

Staff recommends the Commission approve Cascade Natural Gas' (Cascade) proposed tariff sheets in Docket No. UG 299/Advice No. O15-07-01 and Docket No. UG 303/ Advice No. O15-07-05, with an effective date of November 1, 2015.

ISSUE:

Cascade's Purchased Gas Adjustment (PGA) allows Cascade to annually reset rates based on updated forecasts of gas and gas-related costs and recover or return to customers, a portion of the variance between the gas costs collected in rates over the previous year and the actual costs incurred by the utility. In this report, Staff discusses Cascade's forecasted costs and proposed rates for the upcoming "gas year" and Cascade's calculation of the true-up amounts for the previous "gas year."

APPLICABLE STATUTES AND RULES:

ORS 757.210 authorizes the Commission to establish the rates charged by public utilities. ORS 757.259(5) authorizes the Commission to allow a utility to amortize costs the overall average rate impact of the amortizations authorized under ORS 757.259 in any one year may not exceed three percent of the utility's gross revenues for the preceding calendar year.

ANALYSIS:

On August 1, 2015, Cascade filed its annual PGA requesting rate changes related to natural gas commodity purchases and the costs to deliver this gas to Cascade's system for the upcoming gas year (a "gas year" runs from November 1 to October 31 of the following calendar year). The PGA is filed to adjust rates yearly based upon:

(1) **A Forward Looking Portion**: An estimate of the commodity, pipeline, and storage costs – collectively referred to as the purchased cost of gas – for the upcoming gas year using projections for the price of natural gas and customer usage; and

(2) **A Backward Looking Portion:** A true-up of balances in deferral accounts due to the inevitable imperfect projection of costs and usage in last year's PGA filing that resulted in over/under-collection relative to those projections.

On September 15, 2015, Cascade submitted its updated and revised PGA filing.

This Staff Report discusses: (1) the forward looking portion; (2) the backward looking portion; and (3) the overall revenue and rate impacts of combining these two segments with non-gas cost components for the 2015-16 gas year.

<u>Forward Looking-Projected Purchased Gas Costs 2014-2015 PGA Year</u>

There are two main components that together make up the purchased cost of gas: (a) commodity costs and (b) demand costs. *Commodity costs* are the cost of the natural gas itself for delivery at specified trading hubs at specific times. *Demand costs* are the cost of pipeline capacity and per unit of gas pipeline transport rates that allow Cascade to transport its gas purchases to its own system (city-gate) at the time it is needed.

Cascade's 2015 PGA proposes a decrease of approximately 26 percent in gas commodity cost compared to that in its 2014 PGA. The decrease is in the gas cost per therm (weighted average cost of gas OR WACOG) because calculation of the percent change uses the 2015 PGA load forecast with the 2014 cost per therm and the 2015 WACOG to derive the change in total purchased gas cost. Based on the 2015 PGA load forecast, this decrease in gas commodity cost is approximately $7,867,965 at $0.10666 per therm. Cascade proposes an increase in demand cost from that in the 2014 PGA of approximately 15 percent or $1,851,546. The combined gas commodity and demand cost change compared to the 2014 PGA is a decrease of approximately 14 percent or $6,016,418 equivalent to $0.08156 per therm. These changes are approximate due to the use of forecasted loads and gas costs.

Staff reviewed Cascade's forecasted commodity and demand costs to determine whether Cascade complied with the Commission's Natural Gas Portfolio Development Guidelines (Portfolio Guidelines).[1]

Accepted "best practices" for the purchase of natural gas supply by a local distribution company (LDC) is through a portfolio that balances the objectives of reliability, cost, and price volatility using the tools of diversity, flexibility, and balance. The Portfolio Guidelines implement these "best practices" for Oregon LDCs. The Portfolio Guidelines also require each gas utility to include certain information related to its gas supply portfolio with its annual PGA filing. This information assists the Commission in determining the prudence of the LDC's costs.

Cascade's portfolio preparation and planning process meets the standards in Section III of the Portfolio Guidelines related to portfolio planning, as do Cascade's physical gas contracts and financial transactions relating to natural gas pricing. Cascade has also demonstrated its adherence to the Portfolio Guidelines with regard to natural gas supplies and financial hedges. In addition, Cascade has provided all the information called for in Section IV (Information and Workpapers), and Section V (Supporting Data and Analysis) of the Portfolio Guidelines. Cascade's planned supply portfolio, both physical and financial, is presented in Table 1.

Table 1: Cascade Natural Gas Supply Portfolio for 2015-2016 PGA Year

Resource	Percentage in Portfolio (appx.)
Pipeline deliveries of natural gas	98%
Storage deliveries of natural gas	2%

Cascade's gas purchasing strategy for the 2015-2016 period is to hedge the prices of approximately 40 percent of the expected purchases. The 40 percent hedging target is planned to include all fixed price physical contracts, and no financial hedges. The remaining 60 percent of expected purchases will come from spot market purchases.

[1] The "Natural Gas Portfolio Development Guidelines" and "PGA Filing Guidelines" were initially acknowledged by the Commission in Order No. 09-248 and initially corrected in Order No. 09-263. The current Guidelines were acknowledged by the Commission in Order No.11-196.

Spring Earnings Review

Each year, Oregon LDCs make an annual election for the upcoming PGA Year whether to share any variance between forecasted and actual gas commodity costs at 90/10[2] percent or 80/20 percent, with a corresponding earnings review threshold. For the 2015-2016 PGA year Cascade elected a 90/10 sharing on July 22, 2015.[3]

Backward Looking-True Up of Gas Commodity Costs for 2014-2015 PGA Year

Just as natural gas prices and demand are projected for the 2015-16 gas year in this year's PGA to determine rates, they were projected in the previous year's PGAs to determine rates in those gas years as well. Due to a number of factors, including natural gas price volatility, weather, and the overall economy, these projections did not match exactly actual experience so that actual revenues collected did not equal those that were estimated.

Cascade's application proposes to true-up its commodity and non-commodity deferred account balance, which has been under amortization since November 1, 2014, and the amount projected for the 2015-2016 PGA period. The commodity gas cost portion of the true-up is a decrease of $2,041,940 to customers. The removal of the prior year amortization is an increase to customers of $7,985 and application of the proposed year amortization is a decrease to customers of $2,033,955. The prior year amortization was projected and included in the 2014 PGA. The proposed year amortization is the sum of the actual balances of the gas cost deferral, firm demand deferral, and interruptible demand deferral accounts as of October 31, 2015.

Staff has reviewed Cascade's proposed gas cost deferral and determined that the proposed amortization is appropriate. The resulting revised rate increment is incorporated in the energy charge component of Cascade's primary rate schedules.

Overall Rate and Revenue Impact

A summary of the proposed tariff changes for Cascade's major rate schedules is shown in Attachment A. Table 2 shows the rates the Commission has approved for Cascade's residential customers on Rate Schedule 101 between 2008 and 2015, the current proposal.

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[2] Sharing of the variance between the LDC's WACOG included in its rates and its actual WACOG. For example, 90/10 designates 90 percent of the variance will be deferred for subsequent charge or credit to customers, and 10 percent is absorbed or retained by the LDC. See Order 08-504 at 17.
[3] The election is filed annually in UM 1286 in compliance with Order No. 11-196 and Order No. 08-504.

Table 2: Residential Rates 2008–2015 (Proposed)

Date	Customer Charge	Rate Per Therm[4]	Percentage Change[5]
November 2008	$3.00	$1.277	5.62%
November 2009	$3.00	$1.112	-12.92%
November 2010	$3.00	$1.047	-5.85%
November 2011	$3.00	$0.975	-6.88%
November 2012	$3.00	$0.796	-18.36%
November 2013	$3.00	$0.900	13.07%
November 2014	$3.00	$0.907	0.78%
November 2015	$3.00	$0.844	-7.0%

With these changes, the monthly bill of a typical residential customer using 56 therms per month will decrease by $3.56, or 6.61 percent, from $53.80 to $50.24.

The change in annual revenues is summarized in Table 3 below:

Table 3: Change in Annual Revenues

PGA Gas Cost Change	-$6,016,418
Gas Cost-related Amortizations	-$1,538,038
Non Gas Cost-related Amortizations	$2,561,179
Total Proposed Change[6]	-$4,993,277

Three Percent Test

The gas cost related amortizations in this filing are included in the calculation of the three percent test pursuant to ORS 757.259(6), which restricts the overall annual average rate impact of amortizations authorized under the statute to three percent of the natural gas utility's gross revenues for the preceding calendar year. For the upcoming gas year, Cascade is requesting to amortize a **reduction** of $976,283. During the last calendar year Cascade's gross revenues were $70,092,488. Therefore, Cascade is seeking to amortize amounts equal to minus 1.39 percent of the previous year's gross revenues (i.e. a credit). This amortization does not exceed the three percent threshold. See Attachment C for a more detailed accounting of amortizations and the three percent test.

[4] This rate does not include pass-through charges included on customer bills that utilities are required to collect and distribute such as franchise fees or the Public Purposes Charge.
[5] The percentage change reflects only the change in the rate per therm, and does not include the effect of the monthly customer charge on the bill.
[6] *See* Attachment B and CA11, CA12, CA 13, and CA14 for details.

PROPOSED COMMISSION MOTION:

Cascade's request for base gas cost changes for commodity and transportation, as proposed in Docket No. UG 299/Advice No. O15-07-01, be allowed to go into effect on November 1, 2015, along with the associated tariff sheets related to Docket No. UG 303/Advice No. O15-07-05.

CNG UG 299/Advice No. O15-07-01 and UG 303/Advice No. O15-07-05

Cascade Natural Gas
2015 PGA
Incremental Revenue Change by Customer Rate Schedule
Attachment A

REVISED

Customer Rate Schedule	Description	Gas Cost & Adjustment Schedule Total Revenue at Current[1]	Gas Cost & Adjustment Schedule Total Revenue at Proposed	Total Incremental Change in Revenue	Incremental Percentage Change by Rate Schedule	Percent Contribution to Total Incremental Change
101	Residential	35,156,380	32,693,515	(2,462,865)	-7.01%	49.32%
104	Commercial	21,738,119	20,026,839	(1,711,279)	-7.87%	34.27%
105	Industrial	2,289,827	1,979,020	(310,807)	-13.57%	6.22%
111	Large Volume	1,412,509	1,211,709	(200,800)	-14.22%	4.02%
112	Compressed Natural Gas					0.00%
126	Emergency Institution					0.00%
170	Interruptible	2,058,259	1,755,992	(302,267)	-14.69%	6.05%
163	Transportation	1,428,267	1,425,244	(3,023)	-0.21%	0.06%
164	Transportation	554,663	552,432	(2,231)	-0.40%	0.04%
						0.00%
						0.00%
						0.00%
						0.00%
						0.00%
						0.00%
		64,638,024	59,644,751	(4,993,273)		100.00%

Notes:

[1] Revenue at "Current" does not reflect current revenues, but rather what the revenues would be if existing rates continued to be in effect during the upcoming year (i.e. current rates times forecasted therms). There will be small differences with the Advice filings.

Cascade Natural Gas
2015 PGA
Incremental Revenue Change by Adjustment Schedule
Attachment B

REVISED

Adjustment Schedule No. & Description		Gas Cost & Adjustment Schedule Revenue at Current [1]	Gas Cost & Adjustment Revenue at Proposed	Total Incremental Change in Revenue	% Contribution to Total Incremental Change
177-A	PGA	$42,629,084	$36,612,666	($6,016,418)	120.49%
191	Temporary Gas Cost Adj	($203,596)	($1,741,634)	($1,538,038)	30.80%
192	Intervenor Funding	$60,844	$41,976	($18,868)	0.38%
193	CAP	($1,901,885)	$681,361	$2,583,246	-51.73%
194-B	Other Residual	$3,199	$0	($3,199)	0.06%
195	Public Purpose				0.00%
196	Earnings Sharing				0.00%
	Margin	$24,050,383	$24,050,383	$0	0.00%
					0.00%
				$0	0.00%
				$0	0.00%
	Total	$64,638,029	$59,644,752	($4,993,277)	100.00%

Note:

[1] Revenue at "Current" does not reflect current revenues, but rather what the revenues would be if existing rates continued to be in effect during the upcoming year (i.e. current rates times forecasted therms). There will be small differences with the Advice filings.

Cascade Natural Gas
2015-2016 PGA
Three Percent Test
Attachment C

	Surcharge	Credit	
Prior Period Gas Cost Deferral True-Up	(1,741,808)		
<u>Non-Gas Cost Amortizations</u>			
Intervenor Funding	$42,037	$0	
Other Residuals	$0	$0	
Decoupling		681,451	
		$0	
		$0	
		$0	
		0	
Subtotal	42,037	681,451	
Total	(1,699,771)	681,451	
Total Proposed Amortization			($1,018,320)
Less: Intervenor Funding[1]			$42,037
Net Proposed Amortizations (subject to the 3% test)			($976,283)
Utility Gross Revenues (2014)			$70,092,488
3% of Utility Gross Revenues[2]			$2,102,775
Allowed Amortization			($976,283)
Allowed Amortization as % of Gross Revenues			-1.39%

[1] Intervenor Funding is excluded from the result of the 3% test pursuant to ORS 757.259(4)

[2] Unadusted general revenues as shown in the most recent Results of Operation.