

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

3 **UG 305**

4 In the Matter of

STAFF MOTION TO ADMIT EXHIBITS

5 **CASCADE NATURAL GAS**
6 **CORPORATION**

7 Request for a General Rate Revision

8 Staff of the Public Utility Commission of Oregon asks the Administrative Law Judge (ALJ) to
9 admit the following pre-filed Staff Exhibits into the record:

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| 10 | Staff 100 | Opening Testimony of Marianne Gardner |
| 11 | Staff 101 | Witness Qualification Statement of Marianne Gardner |
| 12 | Staff 102 | Exhibits in Support of Opening Testimony (re: uncollectibles) |
| 13 | Staff 103 | Exhibits in Support of Opening Testimony (re: wages and salaries) |
| 14 | Staff 104 | Exhibits in Support of Opening Testimony (CNG plant additions adj.) |
| 15 | Staff 105 | Exhibits in Support of Opening Testimony (re: tax-related issues) |
| 16 | Staff 106 | Exhibits in Support of Opening Testimony (re: rate case costs) |
| 17 | Staff 107 | Exhibits in Support of Opening Testimony (re: franchise fees) |
| 18 | Staff 108 | Exhibits in Support of Opening Testimony (re: employee benefits) |
| 19 | Staff 109 | Exhibits in Support of Opening Testimony (re: capital structure calc.) |
| 20 | Staff 110 | Exhibits in Support of Opening testimony (re: inflation factor) |
| 21 | Staff 200 | Opening Testimony of Matt Muldoon |
| 22 | Staff 201 | Witness Qualification Statement of Matt Muldoon |
| 23 | Staff 202 | Staff Peer Screening |
| 24 | Staff 203 | Staff Three Stage DCF Modeling |
| 25 | Staff 204 | Staff Synthetic Forward Curve Tips Analysis |
| 26 | Staff 205 | Staff Historical GDP Analysis with BEA Data |

1	Staff 206	Cost of Long-Term Debt
2	Staff 207	VL Gas and Water Industry Profiles
3	Staff 208	Other Growth Resources
4	Staff 209	Financial Market Snapshot
5	Staff 210	Pensions Overview
6	Staff 300	Opening Testimony of Max St. Brown
7	Staff 301	Witness Qualification Statement of Max St. Brown
8	Staff 302	Exhibits in Support of Testimony (re: load forecast)
9	Staff 303	Exhibits in Support of Testimony (re: revenues/weather normalization)
10	Staff 304 ¹	
11	Staff 305	Exhibits in Support of Testimony (re: weather forecasting models)
12	Staff 400	Opening Testimony of Erik Colville
13	Staff 401	Witness Qualification Statement of Erik Colville
14	Staff 402	Exhibits in Support of Testimony (re: Other gas supply expense)
15	Staff 403	Exhibits in Support of Testimony (re: gas storage in rate base, other gas
16		supply expense, and PGA commodity sharing adjustment)
17	Staff 500	Opening Testimony of Scott Gibbens
18	Staff 501	Witness Qualification Statement of Scott Gibbens
19	Staff 502	Exhibits in Support of Testimony (re: distribution O&M)
20	Staff 503	Exhibits in Support of Testimony (re: distribution O&M)
21	Staff 504	Exhibits in Support of Testimony (re: Atmospheric Corrosion Survey
22		Program)
23	Staff 600	Opening Testimony of Kathy Zarate
24	Staff 601	Witness Qualification Statement of Kathy Zarate
25	Staff 602	Company response to Staff DR No. 57, re: meals and entertainment

¹ Staff did not submit an exhibit labeled Staff Exhibit 304.

1	Staff 603	Company responses to Staff DR Nos. 57, 89, 90, and 345-46 re: accounts for services, etc.
2	Staff 604	Company response to Staff DR No. 157, re: FERC Acct. Nos. 902 and 903
3	Staff 605	Company responses to Staff DR Nos. 375-76 re: postage and electronic billing
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5	Staff 606	Company response to Staff DR No. 315, re: plant material and supplies
6	Staff 700	Opening Testimony of Mitchell Moore
7	Staff 701	Witness Qualification Statement of Mitchell Moore
8	Staff 702	Exhibits in Support of Opening Testimony (re: D&O insurance, education and training, and capital additions)
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10	Staff 703	Exhibits in Support of Opening Testimony (re: capital additions)
11	Staff 704	Exhibits in Support of Opening Testimony (re: capital additions)
12	Staff 800	Opening Testimony of Scott Shearer
13	Staff 801	Witness Qualification Statement of Scott Shearer
14	Staff 802	Exhibits in Support of Opening Testimony (consumer services complaint records and statistics)
15		
16	Staff 803	Exhibits in Support of Opening Testimony (proposed tariff language revisions)
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18	Staff 900	Opening Testimony of Ming Peng
19	Staff 901	Witness Qualification Statement of Ming Peng
20	Staff 902	Exhibits in Support of Opening Testimony (re: depreciation expense)
21	Staff 1000	Opening Testimony of Lance Kaufman
22	Staff 1001	Witness Qualification Statement of Lance Kaufman
23	Staff 1002	CNG's 2015 Affiliated Interest Report)
24	Staff 1003	List of MDUR subsidiaries
25	Staff 1004	CNG Guidelines for Cost Allocations and Affiliate Transactions
26		

- 1 Staff 1005 Exhibits in Support of Opening testimony (re: customer service allocation
2 adjustment)
- 3 Staff 1100 Opening Testimony of Judy Johnson
- 4 Staff 1101 Witness Qualification Statement
- 5 Staff 1102 Exhibits in Support of Opening Testimony (re: environmental
6 remediation)
- 7 Staff 1200 Opening Testimony of Jean-Pierre (JP) Batmale
- 8 Staff 1201 Witness Qualification Statement of Jean-Pierre Batmale
- 9 Staff 1300 Opening Testimony of George Compton
- 10 Staff 1301 Witness Qualification Statement of George Compton
- 11 Staff 1302 Plant Carrying Costs
- 12 Staff 1303 Mains System Replacement Cost
- 13 Staff 1304 LRIC Study Summary
- 14 Staff 1305 Cost Functionalization
- 15 Staff 1306 CNG Response to Staff DR No. 123

16 The Staff testimony and witness qualification statements are supported by the
17 declarations of the witnesses attached to this motion.

18
19 DATED this 7th day of November 2016.

20 Respectfully submitted,

21 ELLEN F. ROSENBLUM
22 Attorney General

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24 Stephanie S. Andrus, #92512
25 Senior Assistant Attorney General
26 Of Attorneys for Staff of the Public Utility
Commission of Oregon

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

3 **UG 305**

4 **DECLARATION OF MARIANNE GARDNER**

5 In the Matter of

6 **CASCADE NATURAL GAS**
7 **CORPORATION**

8 Request for a General Rate Revision

9 I, Marianne Gardner, declare under penalty of perjury under the laws of the State of
10 Oregon:

11 1. My name is Marianne Gardner. I am employed as a Senior Revenue
12 Requirements Analyst in the Energy Rates, Finance and Audit Division of the Public Utility
13 Commission of Oregon.

14 2. I prepared Opening Testimony and a Witness Qualification Statement for the
15 above-captioned docket, previously submitted as Staff Exhibits 100 and 101.

16 3. I also assisted in the preparation of Joint Testimony in Support of Stipulation,
17 previously submitted as Stipulating Parties Exhibit 100.

18 4. My pre-filed Opening Testimony and my statements in my Witness Qualification
19 Statement and the Joint Testimony in Support of Stipulation (Exhibits Staff/100 and Staff/101
20 and Stipulating Parties/100) are true and accurate.

21 I hereby declare that the above statements are true to the best of my knowledge and belief
22 and that I understand my testimony will be used as evidence before the Public Utility
23 Commission of Oregon and is subject to penalty for perjury.

24 Signed: Marianne Gardner

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

3 **UG 305**

4 **DECLARATION OF MATT MULDOON**

4 In the Matter of
5 CASCADE NATURAL GAS
6 CORPORATION
7 Request for a General Rate Revision


8 I, Matt Muldoon, declare under penalty of perjury under the laws of the State of Oregon:

9 1. My name is Matt Muldoon. I am employed as a Senior Economist in the Energy
10 Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

11 2. I prepared Opening Testimony and a Witness Qualification Statement for the
12 above-captioned docket, previously submitted as Staff Exhibits 200 and 201.

13 3. My pre-filed Opening Testimony and the statements in my Witness Qualification
14 Statement (Staff/200, Staff/201) are true and accurate.

15 I hereby declare that the above statements are true to the best of my knowledge and belief
16 and that I understand my testimony will be used as evidence before the Public Utility
17 Commission of Oregon and is subject to penalty for perjury.

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19 Signed: 
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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 305

In the Matter of
CASCADE NATURAL GAS
CORPORATION,
Request for a General Rate Revision


DECLARATION OF
ERIK COLVILLE

I, ERIK COLVILLE, declare under penalty of perjury under the laws of the State of Oregon:

- 1. My name is Erik Colville. I am employed by the Public Utility Commission of Oregon as a Senior Utility Analyst in the Utility Program’s Energy Resources and Planning Division.
- 2. I am the same Erik Colville who prepared Staff Testimony previously filed in this docket as Staff Exhibit/400. I also prepared my witness qualification statement and exhibits, previously filed as Staff Exhibit/401-403.
- 3. My testimony, witness qualification statement, and exhibits are true and accurate based on my knowledge and belief.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence before the Public Utility Commission of Oregon and is subject to penalty for perjury.

SIGNED this 15 day of September, 2016 at Salem, Oregon.

Signed: 

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

3 **UG 305**

4 **DECLARATION OF KATHY ZARATE**

5 In the Matter of

6 **CASCADE NATURAL GAS**
7 **CORPORATION**

8 Request for a General Rate Revision

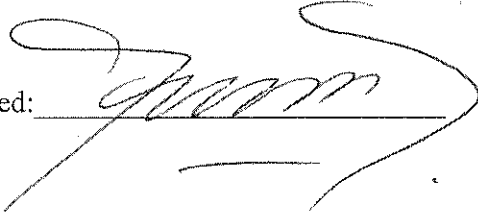
9 I, Kathy Zarate, declare under penalty of perjury under the laws of the State of Oregon:

10 1. My name is Kathy Zarate. I am employed as an Economist in the Energy Rates,
11 Finance and Audit Division of the Public Utility Commission of Oregon.

12 2. I prepared Opening Testimony and a Witness Qualification Statement for the
13 above-captioned docket, previously submitted as Staff Exhibits 600 and 601.

14 3. My pre-filed Opening Testimony and the statements in my Witness Qualification
15 Statement (Exhibits Staff/600 and Staff/601) are true and accurate.

16 I hereby declare that the above statements are true to the best of my knowledge and belief
17 and that I understand my testimony will be used as evidence before the Public Utility
18 Commission of Oregon and is subject to penalty for perjury.

19 Signed: 

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

3 **UG 305**

4 In the Matter of
5 CASCADE NATURAL GAS
6 CORPORATION
7 Request for a General Rate Revision

DECLARATION OF MING PENG

8 I, Ming Peng, declare under penalty of perjury under the laws of the State of Oregon:

9 1. My name is Ming Peng. I am employed as a Senior Economist in the Energy
10 Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

11 2. I prepared Opening Testimony and a Witness Qualification Statement for the
12 above-captioned docket, previously submitted as Staff Exhibits 900 and 901.

13 3. My pre-filed Opening Testimony and the statements in my Witness Qualification
14 Statement (Exhibits Staff/900 and Staff/901) are true and accurate.

15 I hereby declare that the above statements are true to the best of my knowledge and belief
16 and that I understand my testimony will be used as evidence before the Public Utility
17 Commission of Oregon and is subject to penalty for perjury.

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19 Signed: 