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July 21, 2020

Oregon Public Utility Commission  
Attention: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

RE: Cascade Natural Gas Corporation's Petition for a Waiver of OAR 860-022-0015

Attention Filing Center:

Cascade Natural Gas Corporation ("Company"), pursuant to the provisions of ORS 756.040 and in accordance with OAR 860-021-0005, encloses for filing its Petition for Waiver of OAR 860-022-0015. This waiver will allow the Company to implement a new franchise agreement effective September 1, 2020, for the City of Redmond, OR.

If you have any questions concerning this submittal, please contact me at (509) 734-4593.

Sincerely,

*/s/ Michael Parvinen*

Michael Parvinen  
Director, Regulatory Affairs

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

In the Matter of  
Cascade Natural Gas Corporation  
Petition for a Waiver of OAR 860-022-0015

PETITION OF CASCADE NATURAL  
GAS CORPORATION

1 Cascade Natural Gas Corporation (“Cascade” or “Company”) files this petition under the  
2 provisions of ORS 756.040 and in accordance with OAR 860-021-0005. Cascade seeks an order  
3 from the Public Utility Commission of Oregon (Commission) granting a waiver of OAR 860-  
4 022-0015. OAR 860-022-0015 requires the utility to inform customers at least 30 days before  
5 the effective date of filing with the Commission any new changes in rates, tolls, charges, rules, or  
6 regulations. The Company respectfully requests a waiver of OAR 860-022-0015 to allow the  
7 Company to implement a new franchise agreement effective September 1, 2020 for the City of  
8 Redmond, OR which raises the franchise fee to 7% of gross revenues, of which the base  
9 franchise fee is 3% and the incremental franchise fee is 4%.

**I. Background**

12 Keeping customers informed of changes and bill impacts of rate revisions is a top priority  
13 for Cascade. The Company regularly communicates with customers regarding changes to rates  
14 and other operational changes through various channels including customer bill inserts. Cascade  
15 only recently found out about this increase in the franchise fee, which was approved by the City  
16 of Redmond on July 8, 2020. This short time window made it infeasible for Cascade to order the  
17 required printing materials and to make internal planning requirements necessary to send out

1 customer notices via bill inserts within the 30-day requirement as outlined in OAR 860-022-  
2 0015. Cascade has prepared a customer announcement which it intends to send to customers  
3 immediately within the operational constraints of printing and mailing announcements to its  
4 customers within its Redmond, Oregon service territory. As such, the announcements may  
5 initially be received by customers outside of the 30-day requirement.

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## **II. Governing Authority**

8 Commission rules require a utility to announce utility tariff changes within a specified  
9 30-day timeframe:

10 OAR 860-022-0015 requires the following:

11 Except as hereinafter provided in this division, energy utilities and large  
12 telecommunications utilities must file with the Commission all tariffs, rate  
13 schedules, or supplements thereto containing any change in rates, tolls, charges,  
14 rules, or regulations at least 30 days before the effective date of such changes. The  
15 Commission will reject tariffs or schedules not conforming with the rules in this  
16 division.

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## **III. Request for Waiver**

19 OAR 860-021-0005 allows the Commission to grant waivers of Division 21 rules  
20 for good cause shown. Cascade respectfully seeks waiver of the specific provisions of OAR  
21 860-022-0015 requiring the utility to send announcements regarding its proposed rate revisions  
22 within 30 days of filing. The Company intends to make a good faith effort to send such

1 announcements immediately within the time and operation constraints required to execute its bill  
2 insert mailing.

3  
4  
5 DATED: July 21, 2020

7 Sincerely,

9  
10 */s/ Michael Parvinen*

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12 \_\_\_\_\_  
13 Michael Parvinen  
14 Director, Regulatory Affairs  
15 Cascade Natural Gas Corporation  
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