

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UG 347**

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

MOTION TO ADMIT PRE-FILED STAFF  
EXHIBITS

Staff of the Public Utility Commission of Oregon (Staff) asks the Administrative Law Judge to admit the following pre-filed Staff Exhibits into the record in the above-captioned docket:

<b>Exhibit No.</b>	<b>Exhibit</b>
Staff Exhibit 100	Opening Testimony of Marianne Gardner
Staff Exhibit 101	Witness Qualification Statement of Marianne Gardner
Staff Exhibit 200	Opening Testimony of John L. Fox
Staff Exhibit 201	Witness Qualification Statement of John L. Fox
Staff Exhibit 202	Cascade Responses to Staff Data Requests
Staff Exhibit 300	Opening Testimony of Brian Fjeldheim
Staff Exhibit 301	Witness Qualification Statement of Brian Fjeldheim
Staff Exhibit 400	Opening Testimony of Scott Gibbens
Staff Exhibit 401	Witness Qualification Statement of Scott Gibbens
Staff Exhibit 402	Cascade Forecast Model Design Document
Staff Exhibit 500	Opening Testimony of Deborah Glosser
Staff Exhibit 600	Opening Testimony of Mitchell Moore
Staff Exhibit 601	Witness Qualification Statement of Mitchell Moore

1	Staff Exhibit 700	Opening Testimony of Sabrina Soldavini
2	Staff Exhibit 701	Witness Qualification Statement of Sabrina Soldavini
3	Staff Exhibit 702	Cascade 2017 Cost Allocation Manual
4	Staff Exhibit 703	Cascade 2015 Cost Allocation Manual
5	Staff Exhibit 704	NARUC Guidelines for Cost Allocations and Affiliate Transactions
6	Staff Exhibit 705	Cascade Data Request Responses
7	Staff Exhibit 800	Opening Testimony of Paul Rossow
8	Staff Exhibit 801	Witness Qualification Statement of Paul Rossow
9	Staff Exhibit 900	Opening Testimony of Jeffrey Watson
10	Staff Exhibit 901	Witness Qualification Statement of Jeffrey Watson
11	Staff Exhibit 902	Workpaper and Analysis of Pension Expense
12	Staff Exhibit 903	Workpaper and Analysis of Medical Benefit Expenses
13	Staff Exhibit 1000	Opening Testimony of Kathy Zarate
14	Staff Exhibit 1001	Witness Qualification Statement of Kathy Zarate
15	Staff Exhibit 1002	Cascade Responses to Data Requests
16	Staff Exhibit 1100	Opening Testimony of Ming Peng
17	Staff Exhibit 1101	Witness Qualification Statement of Ming Peng
18	Staff Exhibit 1102	Cascade Responses to Data Requests
19	Staff Exhibit 1200	Testimony of John L. Fox in Support of Stipulation
20	Staff Exhibit 1201	Summary of Proposed Gross Plant Adjustments
21	Staff Exhibit 1202	Cascade Response to Staff Data Requests
22	Staff Exhibit 1300	Testimony of Matt Muldoon and Jeffrey Watson in Support of Stipulation
23	Staff Exhibit 1301	Witness Qualification Statement of Matthew Muldoon
24	Staff Exhibit 1302	Updated Witness Qualification Statement of Jeffrey Watson
25	Staff Exhibit 1303	Staff Three-Stage DCF Peer Screening
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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 347

In the Matter of	)	
	)	
CASCADE NATURAL GAS	)	
CORPORATION	)	DECLARATION OF
	)	BRIAN FJELDHEIM
Request for a General Rate Revision	)	
_____	)	

I, Brian Fjeldheim, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Financial Analyst for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 300 and Staff Exhibit 301 (witness qualification statement).

3. I have reviewed and also adopt testimony drafted by Staff witness Deborah Glosser, pre-filed as Staff Exhibit 500.

3. To the best of my knowledge, my pre-filed testimony, adopted testimony and witness qualification statement are true and accurate.

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 in court and is subject to penalty for perjury.

SIGNED this 31 day of January 2019.

  
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 BRIAN FJELDHEIM



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 347

In the Matter of	)	
	)	
CASCADE NATURAL GAS	)	
CORPORATION	)	DECLARATION OF
	)	JOHN L. FOX
Request for a General Rate Revision	)	
_____	)	

I, John L. Fox, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Financial Analyst for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.


2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 200 and Staff Exhibit 201 (witness qualification statement).

3. Also on behalf of Staff, I drafted Staff testimony in support of the Stipulation pre-filed in this docket as Staff Exhibit 1200.

4. To the best of my knowledge, my pre-filed testimony and my witness qualification statement are true and accurate.

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 in court and is subject to penalty for perjury.

SIGNED this 30 day of January 2019.



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JOHN L. FOX

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 347

In the Matter of )  
CASCAD E NATURAL GAS )  
CORPORATION )  
Request for a General Rate Revision )

DECLARATION OF  
MARIANNE GARDNER

I, Marianne Gardner, state the following, under penalty of perjury in the State of Oregon:

1. I am a Program Manager for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 100 and Staff Exhibit 101 (witness qualification statement).

3. On behalf of Staff, I sponsored the pre-filed joint testimony submitted for use in this docket in support of the Stipulation entitled Stipulating Parties/Parvinen et al (Exhibit Stipulating Parties/100).

4. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

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 in court and is subject to penalty for perjury.

SIGNED this 8 day of February 2019.

  
MARIANNE GARDNER



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 347

In the Matter of	)	
	)	
CASCADE NATURAL GAS	)	
CORPORATION	)	DECLARATION OF
	)	MITCHELL MOORE
Request for a General Rate Revision	)	
_____	)	

I, Mitchell Moore, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Utility Analyst for the Public Utility Commission of Oregon Staff (“Staff”). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 600 and Staff Exhibit 601 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

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 in court and is subject to penalty for perjury.

SIGNED this 31 day of January 2019.



MITCHELL MOORE



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 347

In the Matter of )  
 )  
CASCADE NATURAL GAS )  
CORPORATION )  
Request for a General Rate Revision )  
\_\_\_\_\_ )

DECLARATION OF  
MATTHEW J. MULDOON

I, Matthew J. Muldoon, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Economist for the Public Utility Commission of Oregon Staff (“Staff”). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I co-drafted Staff testimony in support of the Stipulation pre-filed in this docket as Staff Exhibit 1300 and drafted Staff Exhibit 1301 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

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 in court and is subject to penalty for perjury.

SIGNED this 30 day of January 2019.

  
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MATTHEW J. MULDOON

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 347

In the Matter of	)	
	)	
CASCADE NATURAL GAS	)	
CORPORATION	)	DECLARATION OF
	)	MING PENG
Request for a General Rate Revision	)	
_____	)	

I, Ming Peng, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Economist for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1100 and Staff Exhibit 1101 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

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 in court and is subject to penalty for perjury.

SIGNED this 29<sup>th</sup> day of January 2019.

  
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 MING PENG

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 347

In the Matter of	)	
	)	
CASCADE NATURAL GAS	)	
CORPORATION	)	DECLARATION OF
	)	PAUL ROSSOW
Request for a General Rate Revision	)	
_____	)	

I, Paul Rossow, state the following, under penalty of perjury in the State of Oregon:

1. I am a Utility Analyst for the Public Utility Commission of Oregon Staff (“Staff”). I work in the Energy Resources and Planning Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 800 and Staff Exhibit 801 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

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 in court and is subject to penalty for perjury.

SIGNED this 29 day of January 2019.

*Paul Rossow*  
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 PAUL ROSSOW

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 347

In the Matter of )

CASCADE NATURAL GAS )  
CORPORATION )

Request for a General Rate Revision )

DECLARATION OF  
SABRINNA SOLDAVINI

I, Sabrina Soldavini, state the following, under penalty of perjury in the State of Oregon:

1. I am a Utility Economist for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 700 and Staff Exhibit 701 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

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 in court and is subject to penalty for perjury.

SIGNED this 30<sup>th</sup> day of January 2019.

  
SABRINA SOLDAVINI



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 347

In the Matter of	)	
	)	
CASCADE NATURAL GAS	)	
CORPORATION	)	DECLARATION OF
	)	JEFFREY WATSON
Request for a General Rate Revision	)	
_____	)	

I, Jeffrey Watson, state the following, under penalty of perjury in the State of Oregon:

1. I am a Consumer Services Analyst for the Public Utility Commission of Oregon Staff ("Staff"). I currently work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 900 and Staff Exhibit 901 (witness qualification statement).

3. Also on behalf of Staff, I co-drafted Staff testimony in support of the Stipulation filed in this docket as Exhibit 1300 and drafted Staff Exhibit 1302 (updated witness qualification statement).

4. To the best of my knowledge, my pre-filed testimony and witness qualification statements are true and accurate.

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 in court and is subject to penalty for perjury.

SIGNED this 8<sup>th</sup> day of February 2019.




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JEFFREY WATSON

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 347

In the Matter of	)	
	)	
CASCADE NATURAL GAS	)	
CORPORATION	)	DECLARATION OF
	)	KATHY ZARATE
Request for a General Rate Revision	)	
_____	)	

I, Kathy Zarate, state the following, under penalty of perjury in the State of Oregon:

1. I am a Utility Economist for the Public Utility Commission of Oregon Staff (“Staff”). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1000 and Staff Exhibit 1001 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

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 in court and is subject to penalty for perjury.

SIGNED this 31 day of January 2019.




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KATHY ZARATE