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May 4, 2023

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301

RE: LC 83 Cascade Natural Gas 2023 Integrated Resource Plan (IRP) – Petition for Temporary Exemption From OAR 860-027-0400(3)

Cascade Natural Gas Corporation, dba Cascade, encloses its petition for a temporary exemption from OAR 860-027-0400(3). The purpose of this temporary exemption is to change the filing date for its upcoming IRP to June 2, 2023.

If there are any questions regarding this matter, please contact Brian Robertson at (509) 734-4546 or myself at (509) 734-4589. Alternatively, we may be reached at brian.robertson@cngc.com and mark.sellers-vaughn@cngc.com.

Sincerely,
CASCADE NATURAL GAS CORPORATION

Marcus Sellers-Vaughn
Manager, Supply Resource Planning

Attachment:

cc: Alliance of Western Energy Consumers
Green Energy Institute
Oregon Citizens' Utility Board

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

LC 83

In the Matter of

CASCADE NATURAL GAS
CORPORATION, DBA CASCADE
NATURAL GAS,

2023 Integrated Resource Plan.

CASCADE NATURAL GAS
CORPORATION

PETITION FOR TEMPORARY
EXEMPTION FROM OAR 860-027-
0400(3), INTEGRATED RESOURCE
PLAN FILING

I. INTRODUCTION

Cascade Natural Gas Corporation, dba Cascade Natural Gas (Cascade or Company), respectfully requests that the Commission allow it to change the filing date of its upcoming Integrated Resource Plan (IRP) from April 27, 2023, to June 2, 2023. Under OAR 860-860-027-0400(3), Cascade is required to submit an IRP within two years of its previous IRP acknowledgement order, or as otherwise directed by the Commission. Based on material conditions that have created uncertainty about important resource elements involved in the current IRP cycle, Cascade respectfully requests that the Commission allow the Company to file its final IRP no later than June 2, 2023. OAR 860-860-027-0400(1) provides that the Commission may relieve the Company of any obligation in OAR 860-027-0400, including OAR 860-027-0400(3), for good cause shown. This petition describes why good cause exists for the Commission to allow Cascade to move the filing date of its IRP from April 27, 2023, to June 2, 2023.

II. BACKGROUND

Cascade is a natural gas utility subject to the jurisdiction of the Commission regarding rates and terms of natural gas service in Oregon. The Company's principal place of business is 8113 W Grandridge Blvd, Kennewick, Washington 99336.

Communications regarding this petition should be addressed to:

1 Cascade Natural Gas Corporation
2 Attn: Brian Robertson
3 8113 W Grandridge Blvd
4 Kennewick, Washington 99336
5 Telephone: (509) 221-9808
6 Email: Brian.Robertson@cngc.com

Cascade Natural Gas Corporation
Attn: Marcus Sellers-Vaughn
8113 W Grandridge Blvd
Kennewick, Washington 99336
Telephone: (206) 617-2708
Email: Mark.Sellers-Vaughn@cngc.com

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8 **III. DISCUSSION**

9 On April 27, 2021, Cascade received acknowledgement on the Company's 2021
10 IRP, which, pursuant to Order 07-002 and Order No. 07-047, required Cascade to file its
11 next IRP on April 27, 2023.

12 The Company is now seeking to change the filing dates of its IRP to June 2,
13 2023, due to uncertainty surrounding authorization from the Federal Energy Regulatory
14 Commission (FERC) for Gas Transmission Northwest (GTN) to proceed to construct,
15 own and operate an expansion project known as the GTN Xpress Project (GTNX, or
16 Project).

17 The Project is located in Kootenai County, Idaho; Walla Walla County,
18 Washington; and Sherman County, Oregon, and would provide for additional firm
19 capacity on GTN's mainline transmission system from the Kingsgate Meter Station to its
20 Malin Meter Station. The Project consists of modifications to existing compressor
21 stations and installation of various appurtenant and auxiliary facilities. The Project will
22 allow for open access firm transportation service of an additional 150,000 dekatherms
23 per day ("Dth/d") to GTN's Malin Meter Station.

24 Cascade has subscribed to and executed a binding precedent agreement for
25 20,000 Dth/d of capacity available under the Project to serve approximately 310,000
26 customers in 95 Washington and Oregon communities. The additional capacity from the
27 Project is critical to Cascade's ability to reliably meet peak day capacity obligations to

1 those customers as modeled in Cascade’s 2020 IRP and incorporated as a fully
2 contracted resource available to serve residential, commercial, and industrial customers
3 in Cascade’s 2023 IRP.

4 The GTNX capacity has an anticipated in-service date of November 1, 2023. The
5 Project has received all requisite federal, state, and local approvals necessary to
6 proceed with construction of the Project, with the exception of the FERC certificate.
7 FERC issued its final Environmental Impact Statement on November 18, 2022. While
8 the Project has drawn notable commentary from the public as well as from the Attorney
9 Generals of California, Oregon and Washington and other government officials, the
10 Company had reasonable expectations that a final decision on GTNX would be issued
11 by FERC in early 2023. Based on that schedule, Cascade believed it reasonable to
12 assume that should FERC decide not to authorize GTNX, the Company would still have
13 some time, albeit limited, to determine how best to address the modeling impact of such
14 a decision in the 2023 IRP, prior to the filing of the IRP on April 27, 2023.

15 However, on April 4, 2023, FERC issued a data request (Request) for
16 information to assist in the analysis of GTN’s Certificate Application for the project¹,
17 indicating that a complete response should be filed within fourteen (14) business days
18 of the Request’s issuance date. Unfortunately, this also meant that FERC was unlikely
19 to render a decision on GTNX prior to the April 27, 2023, filing date for Cascade’s 2023
20 IRP. FERC’s next public meeting where GTNX may be an agenda item is scheduled for
21 May 18, 2023. As described earlier, GTNX has attracted considerable attention, making
22 the deliberations at FERC a major factor in the resource mix identified in the 2023 IRP.

¹ See GTN Transmission Northwest LLC, Abbreviated Application for a Certificate of Public Convenience and Necessity, filed October 4, 2021, in Docket No. CP22-2-000.

1 The modeling of GTNX in the 2023 IRP directly impacts what resources are available to
2 the Company to address potential upstream pipeline capacity shortfalls during peak or
3 cold weather events plus introduce more lower priced AECO supplies to our Oregon
4 and Washington customers. Should FERC not authorize the Project, but Cascade still
5 include GTNX as it currently stands due to timing of the IRP filing, it would be
6 misleading, confusing, and difficult for stakeholders and Commission to review the
7 whole resource integration to determine if the IRP adequately meets the service needs
8 of Cascade’s customers.

9 Due this uncertainty about the authorization of GTNX, Cascade believes that
10 good cause exists for the Commission to issue an order that requires the Company to
11 file its final 2023 IRP no later than June 2, 2023. It is hoped that following the May 18,
12 2023, FERC public meeting Cascade will have clarity about GTNX, and the timing
13 needed to ensure the 2023 IRP provides all stakeholders and interested parties with the
14 most up to date information and analysis about critical resources and its impact to
15 Cascade fulfilling its obligation to reliably serve our customers. On April 26, 2023,
16 Cascade discussed the Company’s request with OPUC Staff (Staff). Staff was
17 supportive of the change, but also asked Cascade to reach out to other stakeholders,
18 such as the Alliance of Western Energy Consumers (AWEC), the Green Energy
19 Institute, and the Oregon Citizens’ Utility Board (CUB). As of May 4, 2023, these parties
20 have expressed support for the extension request.

21 **IV. CONCLUSION**

22 Cascade Natural Gas requests that the Commission issue an order allowing for a
23 temporary exemption from OAR 860-027-0400(3) and authorizing the Company to file

1 its IRP by June 2, 2023. For the reasons provided above, good cause exists to grant
2 this exemption.

3 Respectfully submitted this 4th day of May 2023.

CASCADE NATURAL GAS

/s/ Marcus Sellers-Vaughn

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