

May 12, 2005

Oregon Public Utility Commission 550 Capitol Street NE Salem, OR 97310-1380

Attention: Ms. Vikie Bailey-Goggins

Administrator, Tariffs and Rate Analysis

Cascade Natural Gas Corporation provides the following in response to the Commission's April 12, 2005 letter requesting deferral account information for the purpose of reauthorizing a deferral for another year. The only accounts that Cascade needs to address are the deferrals associated with Conservation Cost Savings.

1) <u>Description of the Expense</u>

Cascade conducted demand side management (DSM) programs in Oregon beginning in 1993. Recovery of the margin losses generated by energy savings from Company sponsored DSM programs provides a mechanism for Cascade to pursue cost effective DSM opportunities.

2) Reason for Reauthorization

Deferral was approved by Commission Order 93-1484 effective October 1, 1993. Deferral was authorized under ORS 757.259 and OAR 860-27-300 in order to minimize the frequency of rate changes or the fluctuations of rate levels. (ORS 757.259(2)(c)).

Cascade's Oregon tariff schedule 175 allows the Company to recover expenses associated with program investment costs and lost margins associated with energy savings resulting from approved demand side management (DSM) programs through a temporary rate adjustment, amortized over a one-year period to all system supply sales volumes.

3) Deferral Accounts

The DSM deferral is recorded as a debit by the Company in a subaccount of Account 186 (miscellaneous deferred debits).

4) Estimated Annual Deferral

Actual therm savings and resulting margin losses are impossible to predict. At this time, the Company's best estimate of deferrals over the next 12 months deferral period for DSM program costs and margin losses is a debit of about \$119,000, which includes approximately \$105,000 for program costs associated with its High Efficiency Equipment Rebate program.

5) <u>Description and Explanation of Deferral Account Entries</u>

Attached are the PTAC account detail sheets for the DSM programs identifying monthly deferral entries through March 2005.

6) Reasons to Continue Deferral Accounting

It is appropriate that deferral accounting be reauthorized for energy savings margin losses and program investment costs from approved Company sponsored DSM programs for the same reasons that originally established the deferral mechanism. Continuation of this deferral accounting will allow Cascade to be revenue neutral while still sponsoring cost effective energy efficiency DSM programs.

7) Previous OPUC Order

Authorization to defer energy savings margin losses and program investment costs from approved Company sponsored DSM programs was granted by the Commission in Order 93-1484 and reauthorization effective October 1, 1994, July 1, 1995, July 1, 1996, July 1, 1997, July 1, 1998, July 1, 1999, July 1, 2000, July 1, 2001, July 1, 2002, and July 1, 2003 in Order 94-1498, Order 95-692, Order 96-161, Order 97-252, Order 98-260, Order 99-431, Order 00-381, Order 01-554, Order 02-401, Order 03-351, and Order 04-331, respectively.

Cascade seeks reauthorization of these deferral accounts for another 12-month period beginning July 1, 2005. Cascade trusts that the information supplied in this response is sufficient for Staff's purposes. If additional information is required to facilitate Staff's efforts, please contact me directly.

Sincerely,

Katherine J. Barnard

Director, Regulatory Affairs

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Enclosures

State:

Oregon

Description:

1995 Low Flow Showerhead Margin Losses

Account number:

18234302-RA11 (D10015)

Class of customers:

Core

Deferral period:

7/1/95 - 6/30/05

Deferral Account Order:

95-630

Amortization period:

12/1/96-11/30/97

Narrative:

Margin losses resulting from the above approved DSM program deferred in accordance with with Rate Schedule 175. The corresponding program investment costs were deferred separately in account 1860-181040-0-D10017

| 11 H- N/ | 5. | | | 2 | | Transfer to | Deferred |
|------------|----------------|------------|----------|--------------|----------|---------------|----------|
| Month/Year | Rate | Therms | Deferral | Amortization | Interest | Residual Acct | Balance |
| | Transfer balan | ce to RA23 | | | | (4,127.99) | 0.00 |
| Oct-03 | | | 329.00 | | 0.00 | | 329.00 |
| Nov-03 | | | 329.00 | | 2.62 | | 660.62 |
| Dec-03 | | | 329.00 | | 5.43 | | 995.05 |
| Jan-04 | | | 329.00 | | 8.18 | | 1,332.23 |
| Feb-04 | | | 329.00 | | 10.95 | | 1,672.18 |
| Mar-04 | | | 329.00 | | 13.75 | , | 2,014.93 |
| Apr-04 | | | 329.00 | • | 16.57 | | 2,360.50 |
| May-04 | | | 329.00 | | 19.41 | | 2,708.91 |
| Jun-04 | | | 329.00 | | 22.27 | | 3,060.18 |
| Jul-04 | | | 329.00 | | 25.16 | | 3,414.34 |
| Aug-04 | | | 329.00 | | 28.07 | | 3,771.41 |
| Sep-04 | | | 329.00 | | 31.01 | | 4,131.42 |
| | Transfer | Balance to | RA28 | | | (4,131.42) | 0.00 |
| Oct-04 | | | 329.00 | | 0.00 | , | 329.00 |
| Nov-04 | | | 329.00 | | 2.62 | | 660.62 |
| Dec-04 | | | 329.00 | | 5.43 | • | 995.05 |
| Jan-05 | | | 329.00 | | 8.18 | | 1,332.23 |
| Feb-05 | | | 329.00 | | 9.89 | | 1,671.12 |
| Mar-05 | | | 329.00 | | 13.74 | | 2,013.86 |
| | | | | | 10.7 | | 4,010,00 |

State:

Oregon

Core

Description:

School Energy Efficiency Program Margin Loss

Account number:

18234302-RA14 (D10019)

Class of customers:

Deferral period:

Deferral Account Order: Amortization period:

Narrative:

Margin losses resulting from the above approved DSM program deferred in accordance with with Rate Schedule 104. The corresponding program investment costs were deferred separately in account 1860-181040-0-D10016

| | | | | | | Transfer to | Deferred |
|------------|-----------------|------------|----------|--------------|----------|---------------|----------|
| Month/Year | Rate | Therms | Deferral | Amortization | Interest | Residual Acct | Balance |
| | Transfer balanc | e to RA23 | | | | (138.02) | 0.00 |
| Oct-03 | | | 11.00 | | 0.00 | | 11.00 |
| Nov-03 | | | 11.00 | | 0.09 | | 22.09 |
| Dec-03 | | | 11.00 | | 0.18 | | 33.27 |
| Jan-04 | | | 11.00 | | 0.27 | | 44.54 |
| Feb-04 | | | 11.00 | | 0.37 | | 55.91 |
| Mar-04 | | | 11.00 | | 0.46 | | 67.37 |
| Apr-Q4 | | | 11.00 | | 0.55 | | 78.92 |
| May-04 | | | 11.00 | | 0.65 | | 90.57 |
| Jun-04 | | | 11.00 | | 0.74 | | 102.31 |
| Jul-04 | | | 11.00 | | 0.84 | | 114.15 |
| Aug-04 | | | 11.00 | | 0.94 | | 126.09 |
| Sep-04 | | | 11.00 | | 1.04 | | 138.13 |
| | Transfer | Balance to | RA28 | | | (138.13) | 0.00 |
| Oct-04 | | | 11.00 | | 0.00 | | 11.00 |
| · Nov-04 | | | 11.00 | | 0.09 | | 22.09 |
| Dec-04 | | | 11.00 | | 0.18 | | 33.27 |
| Jan-05 | | | 11.00 | | 0.27 | | 44.54 |
| Feb-05 | | | 11.00 | | 0.33 | | 55.87 |
| Mar-05 | | | 11.00 | | 0.46 | | 67.33 |
| | | | | | | | |

State:

Oregon

Description:

Equipment Rebate Program

Account number:

18604301-RA19

Class of customers: Deferral period: Core 04/01/02-

Deferral Account Order:

Amortization period:

10/1/03 - 09/30/04

Narrative:

Program Costs for the above approved DSM program deferred in accordance

with Rate Schedule 175.

| | | | | | | Deferred |
|------------|-----------|------------|-----------|--------------|----------|------------|
| Month/Year | Rate | Therms | Deferral | Amortization | Interest | Balance |
| Apr-02 | | | 2,056.14 | | 0.00 | 2,056.14 |
| May-02 | | | 3,500.00 | | 16.90 | 5,573.04 |
| Jun-02 | | | 850.00 | | 44.34 | 6,467.38 |
| Jul-02 | | | 6,850.00 | | 53.17 | 13,370.55 |
| Aug-02 | | | 4,950.00 | | 109.92 | 18,430.47 |
| Sep-02 | | | 9,000.00 | | 146.64 | 27,577.11 |
| Oct-02 | | | 4,000.00 | | 226.72 | 31,803.83 |
| Nov-02 | | | 14,950.00 | | 253.04 | 47,006.87 |
| Dec-02 | | | 14,300.00 | | 386.46 | 61,693.33 |
| Jan-03 | | | 18,400.00 | • | 507.20 | 80,600.53 |
| Feb-03 | | | 12,400.00 | | 598.52 | 93,599.05 |
| Mar-03 | | | 11,000.00 | | 769.51 | 105,368.56 |
| Apr-03 | | | 5,100.00 | | 838.33 | 111,306.89 |
| May-03 | | | 4,950.00 | | 915.10 | 117,171.99 |
| Jun-03 | | | 9,850.00 | | 932.24 | 127,954.23 |
| Jul-03 | | | 12,000.00 | | 1,051.96 | 141,006.19 |
| Aug-03 | | | 6,600.00 | | 1,159.26 | 148,765.45 |
| Sep-03 | | | 5,250.00 | | 1,183.60 | 155,199.05 |
| Oct-03 | (0.00217) | 2,664,519 | 7,300.00 | (5,782.01) | 1,275.95 | 157,992.99 |
| Nov-03 | (0.00217) | 5,792,100 | 9,800.00 | (12,568.86) | 1,257.02 | 156,481.15 |
| Dec-03 | (0.00217) | 8,748,558 | 9,750.00 | (18,984.37) | 1,286.49 | 148,533.27 |
| Jan-04 | (0.00217) | 11,034,482 | 11,150.00 | (23,944.83) | 1,221.15 | 136,959.59 |
| Feb-04 | (0.00217) | 9,843,532 | 7,850.00 | (21,360.46) | 1,126.00 | 124,575.13 |
| Mar-04 | (0.00217) | 7,585,753 | 5,500.00 | (16,461.08) | 1,024.18 | 114,638.23 |
| Apr-04 | (0.00217) | 5,163,922 | 17,250.00 | (11,205.71) | 942.48 | 121,625.00 |
| May-04 | (0.00217) | 3,666,166 | 2,350.00 | (7,955.58) | 999.92 | 117,019.34 |
| Jun-04 | (0.00217) | 2,605,044 | 9,200.00 | (5,652.95) | 962.06 | 121,528.45 |
| Jul-04 | (0.00217) | 2,020,782 | 8,000.00 | (4,385.10) | 999.13 | 126,142.48 |
| Aug-04 | (0.00217) | 1,782,300 | 4,400.00 | (3,867.59) | 1,037.06 | 127,711.95 |
| Sep-04 | (0.00217) | 2,336,190 | 1,850.00 | (5,069.53) | 1,049.97 | 125,542.39 |
| Oct-04 | (0.00182) | 3,226,560 | 10,350.00 | (5,872.34) | 1,032.13 | 131,052.18 |
| Nov-04 | (0.00182) | 5,703,265 | 6,050.00 | (10,379.94) | 1,042.67 | 127,764.91 |
| Dec-04 | (0.00182) | 9,147,728 | 18,600.00 | (16,648.86) | 1,050.40 | 130,766.45 |
| Jan-05 | (0.00182) | 10,859,565 | 9,300.00 | (19,764.41) | 1,075.08 | 121,377.12 |
| Feb-05 | (0.00182) | 9,267,664 | 3,050.00 | (16,867.15) | 901.32 | 108,461.29 |
| Mar-05 | (0.00182) | 8,164,945 | 16,100.00 | (14,860.20) | 891.70 | 110,592.79 |

State: Oregon

Description: Lost Margins from Equipment Rebate Program

Account number: 18604301-RA20

Class of customers: Core
Deferral period: 04/01/02-

Deferral Account Order:

Amortization period: 10/1/03 - 09/30/04

Narrative: Lost Margins associated with the above approved DSM program deferred in accordance

with Rate Schedule 175. Related program costs deferred to account RA19

| | | | | | | | Deferred |
|----------------|-----------|------------|----------|--------------|-----------------|-------------|-----------|
| Month/Year | Rate | Therms | Deferral | Amortization | Interest | Adjustments | Balance |
| Oct-02 | | | 431.07 | | 0.00 | | |
| Nov-02 | | | 516.18 | | 3.43 | | 431.07 |
| Dec-02 | | | 583.43 | | | | 950.68 |
| Jan-03 | | | 936.86 | | 7.82 12.68 | | 1,541.93 |
| Feb-03 | | | 1,168,47 | | | | 2,491.47 |
| Mar-03 | | | 1,474.16 | | 18.50 | | 3,678.44 |
| Apr-03 | | | 1,546.60 | | 30.24 | | 5,182.84 |
| May-03 | | | 1,681.73 | | 41.24 | | 6,770.68 |
| Jun-03 | | | 81.86 | | 55.66 67.60 | | 8,508.07 |
| Jul-03 | | | 93.88 | | 67.69 71.18 | | 8,657.62 |
| Aug-03 | | | 429.25 | | | | 8,822.68 |
| Sep-03 | | | 785.80 | | 72.53 74.19 | | 9,324.46 |
| Oct-03 | (0.00015) | 2,664,519 | 1,317.19 | (399.68) | | | 10,184.45 |
| Nov-03 | (0.00015) | 5,792,100 | 2,359.43 | (868.82) | 83.73 | | 11,185.69 |
| Dec-03 | (0.00015) | 8,748,558 | 2,598.92 | (1,312.28) | 89.00 104.95 | /4.007.0E | 12,765.30 |
| Jan-04 | (0.00015) | 11,034,482 | 2,751.32 | (1,655.17) | 107.94 | (1,027.25) | 13,129.64 |
| Feb-04 | (0.00015) | 9,843,532 | 2,663.26 | (1,476.53) | 107.94 | | 14,333.73 |
| Mar-04 | (0.00015) | 7,585,753 | 3,063.27 | (1,470.33) | 128.57 | | 15,638.30 |
| Apr-04 | (0.00015) | 5,163,922 | 3,054.82 | (774.59) | 145.45 | | 17,692.28 |
| May-04 | (0.00015) | | 3,368.39 | (549.92) | 165.40 | | 20,117.96 |
| Jun-04 | (0.00015) | 2,605,044 | 169.95 | (390.76) | 189.93 | | 23,101.83 |
| Jul-04 | (0.00015) | 2,020,782 | 173.52 | (303.12) | 189.67 | | 23,070.95 |
| Aug-04 | (0.00015) | 1,782,300 | 175.15 | (267.35) | 190.17 | | 23,131.02 |
| Sep-04 | (0.00015) | 2,336,190 | 177.42 | (350.43) | 190.17 | | 23,228.99 |
| Oct-04 | (0.00037) | 3,226,560 | 3,857.79 | (1,193.83) | 191.12 | | 23,246.95 |
| Nov-04 | (0.00037) | 5,703,265 | 3,904.17 | (2,110.21) | 207.67 | | 26,102.03 |
| Dec-04 | (0.00037) | 9,147,728 | 4,129.53 | (3,384.66) | 231.05 | | 28,103.66 |
| Jan-05 | (0.00037) | 10,859,565 | 4,408.77 | (4,018.04) | 239.07 | | 29,079.58 |
| Feb-05 | (0.00037) | 9,267,664 | 4,144.88 | (3,429.04) | 220.61 | | 29,709.38 |
| Mar-05 | (0.00037) | 8,164,945 | 4,623.02 | (3,021.03) | 251.95 | | 30,645.83 |
| | , | -,, | 1,020.02 | (5,02,1.00) | 231.93 | | 32,499.77 |