

McDowell Rackner & Gibson PC



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December 8, 2015

VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

**Re: UG 287 - In the Matter of CASCADE NATURAL GAS CORPORATION, Request for a
General Rate Revision**

Attention Filing Center:

Attached for filing in Docket UG 287 is an electronic copy of the Motion to Admit Cascade's Pre-Filed Testimony and Exhibits and the supporting Affidavits of Scott W. Madison, Mark A. Chiles, Michael P. Parvinen, Micah Robinson, Ronald J. Amen, and Pamela J. Archer. Please contact this office with any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Wendy McIndoo".

Wendy McIndoo
Office Manager

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 287

In the Matter of

CASCADE NATURAL GAS CORPORATION
Application for a General Rate Revision.

**MOTION TO ADMIT
CASCADE'S PRE-FILED
TESTIMONY AND EXHIBITS**

1 In accordance with OAR 860-001-0420, Cascade Natural Gas Corporation
2 (Cascade), moves for the admission of the following pre-filed testimony and exhibits into the
3 record as evidence in this proceeding:

4 (1) The pre-filed testimony of Scott W. Madison on behalf of Cascade (CNG/100);

5 (2) The pre-filed testimony and exhibits of Mark A. Chiles on behalf of Cascade
6 (CNG/200-204 and CNG/1000-1001);

7 (3) The pre-filed testimony and exhibits of Michael P. Parvinen on behalf of
8 Cascade (CNG/300-311 and CNG/700-716);

9 (4) The pre-filed testimony and exhibits of Micah Robinson on behalf of Cascade
10 (CNG/400-403 and CNG/800);

11 (5) The pre-filed testimony and exhibits of Ronald J. Amen on behalf of Cascade
12 (CNG/500-507); and

13 (6) The pre-filed testimony and exhibits of Pamela J. Archer on behalf of Cascade
14 (CNG/600-602 and CNG/900).

15 This motion is supported by the affidavits of Scott W. Madison, Mark A. Chiles,
16 Michael P. Parvinen, Micah Robinson, Ronald J. Amen, and Pamela J. Archer attesting that
17 their pre-filed testimony and exhibits are true and correct.

1

Respectfully submitted this 8th day of December 2015.

MCDOWELL RACKNER & GIBSON PC

A handwritten signature in black ink, appearing to read "Lisa F. Rackner", written over a horizontal line.

Lisa F. Rackner
Jocelyn C. Pease

Attorneys for Cascade

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 287

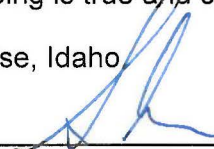
In the Matter of
CASCADE NATURAL GAS CORPORATION
Application for a General Rate Revision.

AFFIDAVIT OF SCOTT W. MADISON

I, Scott W. Madison, being first duly sworn on oath, depose and say:


1. My full name is Scott W. Madison. I am employed by Cascade Natural Gas Corporation (Cascade) and Intermountain Gas Company as Executive Vice President and General Manager. My business address is 555 South Cole Road, Boise, ID 83709. I am appearing in this proceeding as a witness for Cascade.
2. On behalf of Cascade, I prepared the testimony in CNG/100.
3. My witness qualifications statement is included in my testimony in Exhibit CNG/100, Madison/1.
4. To the best of my knowledge, my testimony in CNG/100 is true and correct.
5. I declare under penalty of perjury that the foregoing is true and correct.

SIGNED this 5 day of November, 2015 at Boise, Idaho

Signed: 

SUBSCRIBED AND SWORN to before me this 5th day of November, 2015.




Notary Public, State of Idaho
My Commission Expires 9-24-18

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 287

In the Matter of
CASCADE NATURAL GAS CORPORATION
Application for a General Rate Revision.

AFFIDAVIT OF MARK A. CHILES

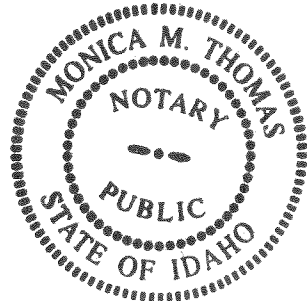
I, Mark A. Chiles, being first duly sworn on oath, depose and say:

1. My full name is Mark A. Chiles. I am the Vice President and Controller for Cascade Natural Gas Corporation (Cascade). My business address is 8113 W. Grandridge Blvd., Kennewick, WA 99336-7166. I am appearing in this proceeding as a witness for Cascade.
2. On behalf of Cascade, I prepared the testimony and exhibits in CNG/200-204 and CNG/1000-1001.
3. My witness qualifications statement is included in my testimony in Exhibit CNG/200, Chiles/1.
4. To the best of my knowledge, my testimony and exhibits in CNG/200-204 and CNG/1000-1001 are true and correct.
5. I declare under penalty of perjury that the foregoing is true and correct.

SIGNED this 23 day of November, 2015 at Boise, Idaho

Signed: 

SUBSCRIBED AND SWORN to before me this 23rd day of November, 2015.



Monica Thomas
Notary Public, State of Idaho
My Commission Expires 9/24/18

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 287

In the Matter of
CASCADE NATURAL GAS CORPORATION
Application for a General Rate Revision.

AFFIDAVIT OF MICHAEL P.
PARVINEN

I, Michael P. Parvinen, being first duly sworn on oath, depose and say:

1. My full name is Michael P. Parvinen. I am the Director of Regulatory Affairs of Cascade Natural Gas Corporation (Cascade). My business address is 8113 W. Grandridge Blvd., Kennewick, WA 99336-7166. I am appearing in this proceeding as a witness for Cascade.
2. On behalf of Cascade, I prepared testimony and exhibits, CNG/300-311 and CNG/700-716;
3. My witness qualifications statement is included in my testimony in CNG/300, Parvinen/1.
4. To the best of my knowledge, my testimony and exhibits in CNG/300-311 and CNG/700-716 are true and correct.
5. I declare under penalty of perjury that the foregoing is true and correct.

SIGNED this 5 day of November, 2015 at Kennewick, Washington.

Signed: *Michael P. Parvinen*

SUBSCRIBED AND SWORN to before me this 5 day of November, 2015.



Trudy Allen Smith
Notary Public, State of WASHINGTON
My Commission Expires 9-1-2016

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 287

In the Matter of
CASCADE NATURAL GAS CORPORATION
Application for a General Rate Revision.

AFFIDAVIT OF MICAH ROBINSON

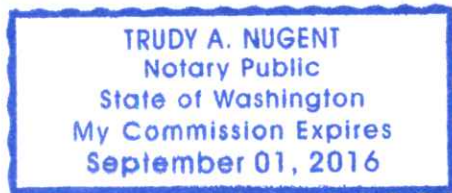
I, Micah Robinson, being first duly sworn on oath, depose and say:

1. My full name is Micah Robinson. I am employed by MRE Consulting, and my present position is Gas Supply and Regulatory Consultant. My business address is 3800 Buffalo Speedway, Suite 200, Houston, TX 77098. I am appearing in this proceeding as a witness for Cascade Natural Gas Corporation (Cascade).
2. On behalf of Cascade, I prepared testimony and exhibits, CNG/400-403 and CNG/800.
3. My witness qualifications statement is included in my testimony in CNG/400, Robinson/1.
4. To the best of my knowledge, my testimony and exhibits in CNG/400-403 and CNG/800 are true and correct.
5. I declare under penalty of perjury that the foregoing is true and correct.

SIGNED this 7th day of December, 2015 at Houston, Texas.

Signed: Micah Robinson

SUBSCRIBED AND SWORN to before me this 7th day of December, 2015.



Trudy A Nugent
Notary Public, State of Washington
My Commission Expires 9-1-2016

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 287

In the Matter of
CASCADE NATURAL GAS CORPORATION
Application for a General Rate Revision.

AFFIDAVIT OF PAMELA J. ARCHER

I, Pamela J. Archer, being first duly sworn on oath, depose and say:

1. My full name is Pamela J. Archer. I am the Supervisor, Regulatory Analysis for Cascade Natural Gas Corporation (Cascade). My business address is 8113 W. Grandridge Blvd., Kennewick, WA 99336-7166. I am appearing in this proceeding as a witness for Cascade.
2. On behalf of Cascade, I prepared testimony and exhibits, CNG/600-602 and CNG/900.
3. My witness qualifications statement is included in my testimony in CNG/600, Archer/1.
4. To the best of my knowledge, my testimony and exhibits in CNG/600-602 and CNG/900 are true and correct.
5. I declare under penalty of perjury that the foregoing is true and correct.

SIGNED this 5th day of November, 2015 at Kennewick, Washington.

Signed: Pamela J. Archer

SUBSCRIBED AND SWORN to before me this 5 day of November, 2015.

Trudy Allen Smith
Notary Public, State of WA
My Commission Expires 9-1-2016

TRUDY ALLEN SMITH
Notary Public
State of Washington
My Commission Expires
September 01, 2016

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 287

In the Matter of
CASCADE NATURAL GAS CORPORATION
Application for a General Rate Revision.

AFFIDAVIT OF RONALD J. AMEN

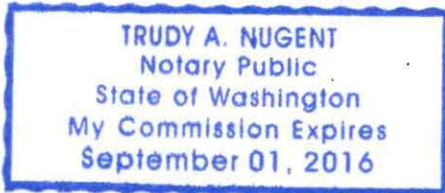
I, Ronald J. Amen, being first duly sworn on oath, depose and say:

1. My full name is Ronald J. Amen. I am employed by Black & Veatch Corporation (Black & Veatch) as a Director and I am a member of the Financial & Regulatory Services Practice within Black & Veatch Management Consulting. My business address is 17806 NE 109th Court, Redmond, Washington 98052-3800. I am appearing in this proceeding as a witness for Cascade Natural Gas Corporation (Cascade).
2. On behalf of Cascade, I prepared testimony and exhibits, CNG/500-507.
3. My witness qualifications statement is included in my testimony in CNG/500, Amen/1-2.
4. To the best of my knowledge, my testimony and exhibits in CNG/500-507 are true and correct.
5. I declare under penalty of perjury that the foregoing is true and correct.

SIGNED this 23rd day of November, 2015 at Redmond, Washington.

Signed: Ronald J. Amen

SUBSCRIBED AND SWORN to before me this 23rd day of November, 2015.



Judy A. Nugent
Notary Public, State of Washington
My Commission Expires 9-1-2016