

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UG 287**

4 In the Matter of

STAFF MOTION TO ADMIT EXHIBITS

5 **CASCADE NATURAL GAS**  
6 **CORPORATION**

7 Request for a General Rate Revision

8 Staff of the Public Utility Commission of Oregon (Staff) asks the administrative law  
9 judge to admit the following pre-filed exhibits into the record in the above-captioned case:  
10

11 Staff Ex 100	Opening Testimony of Marianne Gardner
12 Staff Ex 101	Witness Qualification Statement of Marianne Gardner
13 Staff Ex 102	Staff uncollectibles charts
14 Staff Ex 103	Cascade responses to Staff Data Request Nos. 254, 255, 163
15 Staff Ex 104	Cascade response to Staff Data Request No. 180
16 Staff Ex 200	Opening Testimony of Suparna Bhattacharya
17 Staff Ex 201	Witness Qualification Statement of Suparna Bhattacharya
18 Staff Ex 202	Staff's 2015 Sales Forecasts for Oregon by Rate Schedules (DTH) & City Gate
19 Staff Ex 203	Staff's Revenue Adjustment
20 Staff Ex 204	Cascade response to Standard Data Request Nos. 169, 172, 174, 300, 328
21 Staff Ex 300	Opening Testimony of Max St. Brown
22 Staff Ex 301	Witness Qualification Statement of Max St. Brown
23 Staff Ex 302	Cascade Response to Staff Data Request No. 310
24 Staff Ex 400	Opening Testimony of Erik Colville
25 Staff Ex 401	Witness Qualification Statement of Erik Colville
26 Staff Ex 402	Staff Exhibit re: Other Gas Supply Expense

1	Staff Ex 500	Opening Testimony of Linnea Wittekind
2	Staff Ex 501	Witness Qualification Statement of Linnea Wittekind
3	Staff Ex 502	Cascade response to Staff Data Request No. 190
4	Staff Ex 600	Opening Testimony of Mitch Moore
5	Staff Ex 601	Witness Qualification Statement of Mitch Moore
6	Staff Ex 602	Cascade response to Staff Data Request No. 104
7	Staff Ex 604	Excel spreadsheet of Cascade's advertising expenditures
8	Staff Ex 700	Opening Testimony of Brian Bahr
9	Staff Ex 701	Witness Qualification Statement of Brian Bahr
10	Staff Ex 702	Cascade Response to Staff Data Request Nos. 59, 131, 130, 63, 64, 253, 248, 74, 127, 126, 124, 250, 138, 137, 237, 312, 184, 313, 315, 311; Excerpt of Commission Order No. 09-20; Towers Watson Directors and Officers Liability Survey 2012 Summary of Results,
11		
12	Staff Ex 703	Company's Confidential response to Staff Data Request No. 241
13	Staff Ex 704	Excel Spreadsheet
14	Staff Ex 705	Excel Spreadsheet
15	Staff Ex 800	Opening Testimony of Matt Muldoon
16	Staff Ex 801	Witness Qualification Statement of Matt Muldoon
17	Staff Ex 802	Staff Peer Screening
18	Staff Ex 803	Staff Three-Stage DCF Analysis
19	Staff Ex 804	Staff Synthetic Forward Curve TIPS Analysis
20	Staff Ex 805	Staff Historical GDP Analysis with BEA Data
21	Staff Ex 806	Confidential Cost of LT Debt Table
22	Staff Ex 807	Value Line (VL) Gas and Water Utility Industry Profiles
23	Staff Ex 808	Confidential Risk Assessment
24	Staff Ex 900	Opening Testimony of George Compton
25	Staff Ex 901	Witness Qualification Statement of George Compton
26	Staff Ex 902	Avista Utilities Oregon Jurisdiction Long-Run Incremental Cost of Service Study – Result Summary (Component Allocation)

1	Staff Ex 903	Avista Utilities Oregon Jurisdiction Long-Run Incremental Cost of Service Study – Incremental Investment Costs
2	Staff Ex 904	Cascade Natural Gas Corp. Oregon Jurisdiction Long Run Incremental Cost Study – Mains System Replacement Cost
3	Staff Ex 905	Cascade Natural Gas Corp Oregon Jurisdiction Long Run Incremental Cost Study – Plant Carrying Costs
4	Staff Ex 906	Staff’s Rate Spread
5	Staff Ex 907	Staff’s Estimated Average Monthly Bill Comparison Under Proposed Rates
6	Staff Ex 908	Cascade Response to Staff Data Request Nos. 210, 205, 208, 209, 288, 289, 290, 212, 291
7	Staff Ex 909	Avista Utilities Comparison of Present & Proposed Gas Rates Oregon – Gas
8	Staff Ex 1000	Opening Testimony of Judy Johnson
9	Staff Ex 1001	Witness Qualification Statement of Judy Johnson
10	Staff Ex 1002	Staff Adjustment
11	Staff Ex 1100	Opening Testimony of Ming Peng
12	Staff Ex 1101	Witness Qualification Statement of Ming Peng

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Attached to this motion are affidavits of the 11 Staff witnesses attesting to the truthfulness of their testimony and the statements in their Witness Qualification Statements.

DATED this 15<sup>th</sup> day of December 2015.

Respectfully submitted,

ELLEN F. ROSENBLUM  
Attorney General

Stephanie S. Andrus, #92512  
Senior Assistant Attorney General  
Of Attorneys for Staff of the Public Utility  
Commission of Oregon

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 287**

In the Matter of  
CASCADE NATURAL GAS  
CORPORATION  
Request for a General Rate Revision  
State of Oregon        )  
                                  ) ss.  
County of Marion       )

**AFFIDAVIT OF MARIANNE GARDNER**

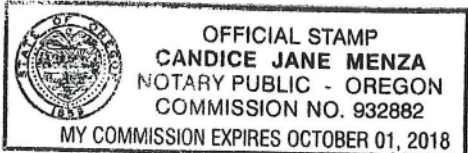
I, Marianne Gardner, depose and say:

1. I am employed at the Public Utility Commission of Oregon as a Senior Revenue Requirement Analyst in the Utility Program’s Energy Rates, Finance, and Audit Division. In the course of my employment, I prepared Staff Testimony previously filed in this docket as Staff Exhibit 100. I also prepared my witness qualification statement, previously filed as Staff Exhibit 101. To best of my knowledge, my previously-filed testimony and the statements in my witness qualification statement are true and accurate.

*Marianne Gardner*  
\_\_\_\_\_  
Marianne Gardner

SUBSCRIBED AND SWORN to before me this 15<sup>th</sup> day of December, 2015.

*Candice Jane Menza*  
\_\_\_\_\_  
Notary Public for Oregon  
My Commission expires: Oct. 1, 2018



1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UG 287**

4 In the Matter of  
5 **CASCADE NATURAL GAS**  
6 **CORPORATION**  
7 Request for a General Rate Revision

AFFIDAVIT OF SUPARNA  
BHATTACHARYA

7 State of Oregon )  
8 County of Marion ) ss.

9 I, Suparna Bhattacharya, depose and say:

10 1. I am employed at the Public Utility Commission of Oregon as a Senior Economist in the  
11 Utility Program's Energy Rates, Finance, and Audit Division. In the course of my employment,  
12 I prepared Staff Testimony previously filed in this docket as Staff Exhibit 200. I also prepared  
13 my witness qualification statement, previously filed as Staff Exhibit 201. To best of my  
14 knowledge, my previously-filed testimony and the statements in my witness qualification  
15 statement are true and accurate.

16 Suparna Bhattacharya  
Suparna Bhattacharya

17 SUBSCRIBED AND SWORN to before me this 11<sup>th</sup> day of December, 2015.

18 Diane Brenda Davis  
19 Notary Public for Oregon  
20 My Commission expires: April 24, 2018



1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UG 287**

4 In the Matter of  
5 **CASCADE NATURAL GAS**  
6 **CORPORATION**  
7 Request for a General Rate Revision

**AFFIDAVIT OF MAX ST. BROWN**

7 State of Oregon )  
8 County of Marion ) ss.

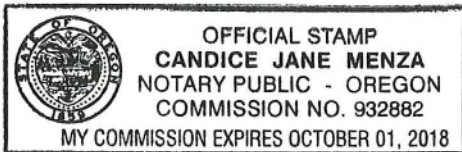
9 I, Max St. Brown, depose and say:

10 1. I am employed at the Public Utility Commission of Oregon as a Utility Economist in the  
11 Utility Program's Energy Rates, Finance, and Audit Division. In the course of my employment,  
12 I prepared Staff Testimony previously filed in this docket as Staff Exhibit 300. I also prepared  
13 my witness qualification statement, previously filed as Staff Exhibit 301. To best of my  
14 knowledge, my previously-filed testimony and the statements in my witness qualification  
15 statement are true and accurate.

16 Max St. Brown 12/11/15  
17 Max St. Brown

18 SUBSCRIBED AND SWORN to before me this 11<sup>th</sup> day of December, 2015.

19 Candice Jane Menza  
20 Notary Public for Oregon  
21 My Commission expires: Oct 1, 2018



1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UG 287**

4 In the Matter of

AFFIDAVIT OF ERIK COLVILLE

5 CASCADE NATURAL GAS  
6 CORPORATION

7 Request for a General Rate Revision

8 State of Oregon )  
9 ) ss.  
10 County of Marion )

11 I, Erik Colville, depose and say:

12 1. I am employed at the Public Utility Commission of Oregon as a Senior Utility Analyst in  
13 the Utility Program's Energy Resources and Planning Division. In the course of my  
14 employment, I prepared Staff Testimony previously filed in this docket as Staff Exhibit 400. I  
15 also prepared my witness qualification statement, previously filed as Staff Exhibit 401. To the  
16 best of my knowledge, my previously-filed testimony and the statements in my witness  
17 qualification statement are true and accurate.

*Erik Colville*

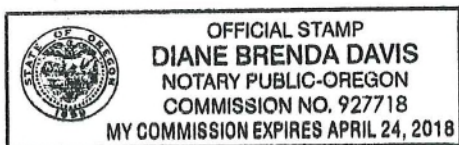
18 Erik Colville

19 SUBSCRIBED AND SWORN to before me this 11<sup>th</sup> day of December, 2015.

*Diane Brenda Davis*

20 Notary Public for Oregon

21 My Commission expires: April 24, 2018



1                                   **BEFORE THE PUBLIC UTILITY COMMISSION**  
2                                   **OF OREGON**

3                                   **UG 287**

4   In the Matter of  
5   CASCADE NATURAL GAS  
6   CORPORATION  
7   Request for a General Rate Revision

AFFIDAVIT OF LINNEA WITTEKIND

7   State of Oregon        )  
8   County of Marion     ) ss.

9   I, Linnea Wittekind, depose and say:

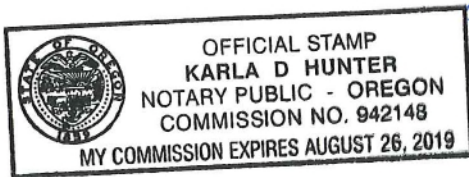
10  1.     I am employed at the Public Utility Commission of Oregon as a Senior Financial Analyst  
11  in the Utility Program's Energy Rates, Finance, and Audit Division. In the course of my  
12  employment, I prepared Staff Testimony previously filed in this docket as Staff Exhibit 500. I  
13  also prepared my witness qualification statement, previously filed as Staff Exhibit 501. To the  
14  best of my knowledge, my previously-filed testimony and the statements in my witness  
15  qualification statement are true and accurate.

16  
17                                   LINNEA WITTEKIND

18  SUBSCRIBED AND SWORN to before me this 14<sup>th</sup> day of December, 2015.

19  
20                                   Notary Public for Oregon

My Commission expires: Aug 26, 2019





1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UG 287**

4 In the Matter of

AFFIDAVIT OF MITCHELL MOORE

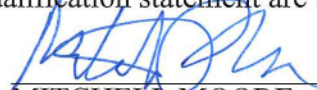
5 **CASCADE NATURAL GAS**  
6 **CORPORATION**

7 Request for a General Rate Revision


8 State of Oregon )  
9 County of Marion ) ss.

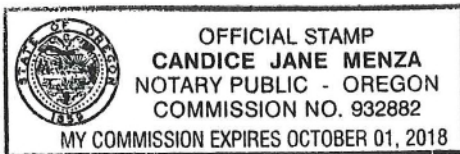
I, Mitchell Moore, depose and say:

10 1. I am employed at the Public Utility Commission of Oregon as a Senior Utility Analyst in  
11 the Utility Program's Energy Rates, Finance, and Audit Division. In the course of my  
12 employment, I prepared Staff Testimony previously filed in this docket as Staff Exhibit 600. I  
13 also prepared my witness qualification statement. To the best of my knowledge, my previously-  
14 filed testimony and the statements in my witness qualification statement are true and accurate.

15   
16 \_\_\_\_\_  
MITCHELL MOORE

17 SUBSCRIBED AND SWORN to before me this 16<sup>th</sup> day of December, 2015.

18   
19 \_\_\_\_\_  
20 Notary Public for Oregon  
21 My Commission expires: Oct. 1, 2015



1                                   **BEFORE THE PUBLIC UTILITY COMMISSION**  
2                                   **OF OREGON**

3                                   **UG 287**

4    In the Matter of  
5    **CASCADE NATURAL GAS**  
6    **CORPORATION**

AFFIDAVIT OF BRIAN BAHR

7    Request for a General Rate Revision


8    State of Oregon         )  
                                   ) ss.  
9    County of Marion        )

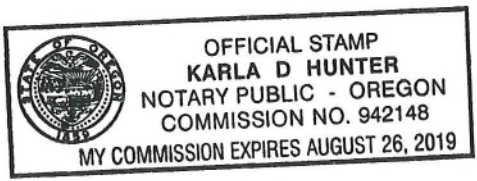
I, Brian Bahr, depose and say:

10 1.     I am employed at the Public Utility Commission of Oregon as a Senior Utility Analyst in  
11 the Utility Program’s Energy Rates, Finance, and Audit Division. In the course of my  
12 employment, I prepared Staff Testimony previously filed in this docket as Staff Exhibit 700. I  
13 also prepared my witness qualification statement, previously filed as Staff Exhibit 701. To the  
14 best of my knowledge, my previously-filed testimony and the statements in my witness  
15 qualification statement are true and accurate.

16                                     
17                                   BRIAN BAHR

18 SUBSCRIBED AND SWORN to before me this 14<sup>th</sup> day of December, 2015.

19                                     
20                                   Notary Public for Oregon  
21                                   My Commission expires: Aug 26, 2019



1                                   **BEFORE THE PUBLIC UTILITY COMMISSION**  
2   **OF OREGON**

3   **UG 287**

4           In the Matter of  
5           **CASCADE NATURAL GAS**  
6           **CORPORATION**  
7           Request for a General Rate Revision

**AFFIDAVIT OF MATT MULDOON**

7   State of Oregon           )  
8   County of Marion        ) ss.

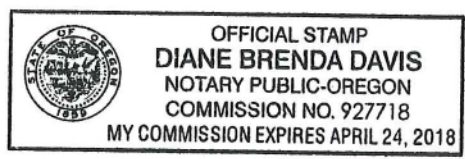
9   I, Matt Muldoon, depose and say:

10   1.     I am employed at the Public Utility Commission of Oregon as a Senior Economist in the  
11   Utility Program's Energy Rates, Finance, and Audit Division. In the course of my employment,  
12   I prepared Staff Testimony previously filed in this docket as Staff Exhibit 800. I also prepared  
13   my witness qualification statement, previously filed as Staff Exhibit 801. To the best of my  
14   knowledge, my previously-filed testimony and the statements in my witness qualification  
15   statement are true and accurate.

16   *Matthew Muldoon*  
17   \_\_\_\_\_  
18   MATT MULDOON

18   SUBSCRIBED AND SWORN to before me this 11<sup>th</sup> day of December, 2015.

19   *Diane Brenda Davis*  
20   \_\_\_\_\_  
21   Notary Public for Oregon  
22   My Commission expires: April 24, 2018



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 287**

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

AFFIDAVIT OF GEORGE COMPTON

State of Oregon        )  
                                  ) ss.  
County of Marion     )

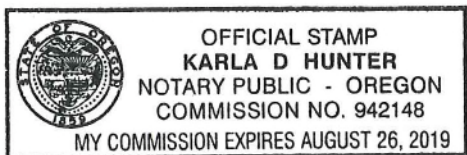
I, George Compton, depose and say:

1. I am employed at the Public Utility Commission of Oregon as a Senior Economist in the Utility Program’s Energy Rates, Finance, and Audit Division. In the course of my employment, I prepared Staff Testimony previously filed in this docket as Staff Exhibit 900. I also prepared my witness qualification statement, previously filed as Staff Exhibit 901. To the best of my knowledge, my previously-filed testimony and the statements in my witness qualification statement are true and accurate.

*George Compton*  
GEORGE COMPTON

SUBSCRIBED AND SWORN to before me this 14<sup>th</sup> day of December, 2015.

*[Signature]*  
Notary Public for Oregon  
My Commission expires: August 26, 2019



1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

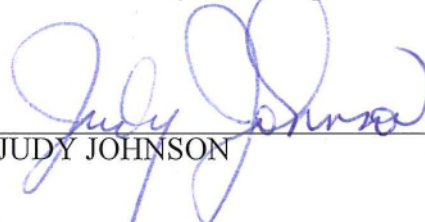
3 **UG 287**

4 In the Matter of  
5 **CASCADE NATURAL GAS**  
6 **CORPORATION**  
7 Request for a General Rate Revision  
8 State of Oregon )  
9 County of Marion ) ss.

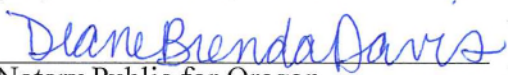
**AFFIDAVIT OF JUDY JOHNSON**

9 I, Judy Johnson, depose and say:

10 1. I am employed at the Public Utility Commission of Oregon as a Senior Economist in the  
11 Utility Program’s Energy Rates, Finance, and Audit Division. In the course of my employment,  
12 I prepared Staff Testimony previously filed in this docket as Staff Exhibit 1000. I also prepared  
13 my witness qualification statement, previously filed as Staff Exhibit 1001. To the best of my  
14 knowledge, my previously-filed testimony and the statements in my witness qualification  
15 statement are true and accurate.

16   
17 JUDY JOHNSON

18 SUBSCRIBED AND SWORN to before me this 11<sup>th</sup> day of December, 2015.

19   
20 Notary Public for Oregon  
21 My Commission expires: April 24, 2018



1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UG 287**

4 In the Matter of  
5 **CASCADE NATURAL GAS**  
6 **CORPORATION**

AFFIDAVIT OF MING PENG

7 Request for a General Rate Revision

8 State of Oregon        )  
9                            ) ss.  
10 County of Marion     )


I, MING PENG, depose and say:

11 1. I am employed at the Public Utility Commission of Oregon as a Senior Economist in the  
12 Utility Program's Energy Rates, Finance, and Audit Division. In the course of my employment,  
13 I prepared Staff Testimony previously filed in this docket as Staff Exhibit 1100. I also prepared  
14 my witness qualification statement, previously filed as Staff Exhibit 1101. To the best of my  
15 knowledge, my previously-filed testimony and the statements in my witness qualification  
16 statement are true and accurate.



MING PENG

18 SUBSCRIBED AND SWORN to before me this 11<sup>th</sup> day of December, 2015.

  
Notary Public for Oregon  
My Commission expires: April 24, 2018

