1			UTILITY COMMISSION
2	OF OREGON		
3		UC	G 305
4	In the Matter of		STAFF MOTION TO ADMIT EXHIBITS
5	CASCADE NATUR	AL GAS	
6	CORPORATION		
7	Request for a Genera	ll Rate Revision	
8	Staff of the Public U	tility Commission of Oreg	on asks the Administrative Law Judge (ALJ) to
9	admit the following pre-filed Staff Exhibits into the record:		
10	Staff 100	Opening Testimony of M	Iarianne Gardner
11	Staff 101	Witness Qualification St	atement of Marianne Gardner
12	Staff 102	Exhibits in Support of Opening Testimony (re: uncollectibles)	
13	Staff 103	Exhibits in Support of Opening Testimony (re: wages and salaries)	
14	Staff 104	Exhibits in Support of Opening Testimony (CNG plant additions adj.)	
15	Staff 105	Exhibits in Support of Opening Testimony (re: tax-related issues)	
16	Staff 106	Exhibits in Support of Opening Testimony (re: rate case costs)	
17	Staff 107	Exhibits in Support of Opening Testimony (re: franchise fees)	
18	Staff 108	Exhibits in Support of O	pening Testimony (re: employee benefits)
19	Staff 109	Exhibits in Support of O	pening Testimony (re: capital structure calc.)
20	Staff 110	Exhibits in Support of O	pening testimony (re: inflation factor)
21	Staff 200	Opening Testimony of M	latt Muldoon
22	Staff 201	Witness Qualification St	atement of Matt Muldoon
23	Staff 202	Staff 202 Staff Peer Screening	
24	Staff 203	Staff Three Stage DCF N	Modeling
25	Staff 204	Staff Synthetic Forward	Curve Tips Analysis
26	Staff 205	Staff Historical GDP An	alysis with BEA Data

1	Staff 206	Cost of Long-Term Debt
2	Staff 207	VL Gas and Water Industry Profiles
3	Staff 208	Other Growth Resources
4	Staff 209	Financial Market Snapshot
5	Staff 210	Pensions Overview
6	Staff 300	Opening Testimony of Max St. Brown
7	Staff 301	Witness Qualification Statement of Max St. Brown
8	Staff 302	Exhibits in Support of Testimony (re: load forecast)
9	Staff 303	Exhibits in Support of Testimony (re: revenues/weather normalization)
10	Staff 304 ¹	
11	Staff 305	Exhibits in Support of Testimony (re: weather forecasting models)
12	Staff 400	Opening Testimony of Erik Colville
13	Staff 401	Witness Qualification Statement of Erik Colville
14	Staff 402	Exhibits in Support of Testimony (re: Other gas supply expense)
15	Staff 403	Exhibits in Support of Testimony (re: gas storage in rate base, other gas
16		supply expense, and PGA commodity sharing adjustment)
17	Staff 500	Opening Testimony of Scott Gibbens
18	Staff 501	Witness Qualification Statement of Scott Gibbens
19	Staff 502	Exhibits in Support of Testimony (re: distribution O&M)
20	Staff 503	Exhibits in Support of Testimony (re: distribution O&M)
21	Staff 504	Exhibits in Support of Testimony (re: Atmospheric Corrosion Survey
22		Program)
23	Staff 600	Opening Testimony of Kathy Zarate
24	Staff 601	Witness Qualification Statement of Kathy Zarate
25	Staff 602	Company response to Staff DR No. 57, re: meals and entertainment
26 _		

Staff did not submit an exhibit labeled Staff Exhibit 304.

Page 2 - STAFF MOTION TO ADMIT EXHIBITS

1	Staff 603	Company responses to Staff DR Nos. 57, 89, 90, and 345-46 re: accounts for services, etc.
2	Staff 604	Company response to Staff DR No. 157, re: FERC Acct. Nos. 902 and 903
3	Staff 605	Company responses to Staff DR Nos. 375-76 re: postage and electronic
4	G. 00 60 6	billing
5	Staff 606	Company response to Staff DR No. 315, re: plant material and supplies
6	Staff 700	Opening Testimony of Mitchell Moore
7	Staff 701	Witness Qualification Statement of Mitchell Moore
8	Staff 702	Exhibits in Support of Opening Testimony (re: D&O insurance, education
9		and training, and capital additions)
10	Staff 703	Exhibits in Support of Opening Testimony (re: capital additions)
11	Staff 704	Exhibits in Support of Opening Testimony (re: capital additions)
12	Staff 800	Opening Testimony of Scott Shearer
13	Staff 801	Witness Qualification Statement of Scott Shearer
14	Staff 802	Exhibits in Support of Opening Testimony (consumer services complaint
15		records and statistics)
16	Staff 803	Exhibits in Support of Opening Testimony (proposed tariff language
17		revisions)
18	Staff 900	Opening Testimony of Ming Peng
19	Staff 901	Witness Qualification Statement of Ming Peng
20	Staff 902	Exhibits in Support of Opening Testimony (re: depreciation expense)
21	Staff 1000	Opening Testimony of Lance Kaufman
22	Staff 1001	Witness Qualification Statement of Lance Kaufman
23	Staff 1002	CNG's 2015 Affiliated Interest Report)
24	Staff 1003	List of MDUR subsidiaries
25	Staff 1004	CNG Guidelines for Cost Allocations and Affiliate Transactions
26		

Page 3 - STAFF MOTION TO ADMIT EXHIBITS

1	Staff 1005	Exhibits in Support of Opening testimony (re: customer service allocation
2		adjustment)
3	Staff 1100	Opening Testimony of Judy Johnson
4	Staff 1101	Witness Qualification Statement
5	Staff 1102	Exhibits in Support of Opening Testimony (re: environmental
6	2	remediation)
7	Staff 1200	Opening Testimony of Jean-Pierre (JP) Batmale
8	Staff 1201	Witness Qualification Statement of Jean-Pierre Batmale
9	Staff 1300	Opening Testimony of George Compton
10	Staff 1301	Witness Qualification Statement of George Compton
11	Staff 1302	Plant Carrying Costs
12	Staff 1303	Mains System Replacement Cost
13	Staff 1304	LRIC Study Summary
14	Staff 1305	Cost Functionalization
15	Staff 1306	CNG Response to Staff DR No. 123
16	The Staff test	imony and witness qualification statements are supported by the
17	declarations of the w	itnesses attached to this motion.
18	ملاء	
19	DATED this d	ay of November 2016.
20		Respectfully submitted,
21		ELLEN F. ROSENBLUM
22		Attorney General
23		
24		Stephanie S. Andrus, #92512 Sepier Assistant Attorney General
25		Senior Assistant Attorney General Of Attorneys for Staff of the Public Utility
26		Commission of Oregon

Page 4 - STAFF MOTION TO ADMIT EXHIBITS

1			CUTILITY COMMISSION OREGON
2			
3		U	G 305
4	In the Matte	er of	DECLARATION OF MARIANNE GARDNER
5		NATURAL GAS	
6	CORPORA		
7	Request for	a General Rate Revision	
8	I, M	arianne Gardner, declare under pen	alty of perjury under the laws of the State of
9	Oregon:		
10	1.	My name is Marianne Gardner.	I am employed as a Senior Revenue
11	Requiremen	ts Analysist in the Energy Rates, F	inance and Audit Division of the Public Utility
12	Commission	n of Oregon.	
13	2.	I prepared Opening Testimony	and a Witness Qualification Statement for the
14	above-captioned docket, previously submitted as Staff Exhibits 100 and 101.		
15	3.	I also assisted in the preparation	of Joint Testimony in Support of Stipulation,
16	previously s	ubmitted as Stipulating Parties Exl	nibit 100.
17	4.	My pre-filed Opening Testimon	y and my statements in my Witness Qualification
18	Statement a	nd the Joint Testimony in Support	of Stipulation (Exhibits Staff/100 and Staff/101
19	and Stipulat	ing Parties/100) are true and accura	ate.
20	I her	reby declare that the above statemen	nts are true to the best of my knowledge and belief
21	and that I understand my testimony will be used as evidence before the Public Utility		
22	Commission	n of Oregon and is subject to penalt	ty for perjury.
23			
24		Si	igned: Marianne Gardner
25			
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1			UTILITY COMMISSION REGON
2		U	G 305
3			DECLARATION OF MATT MULDOON
4	In the Matter	of	
5	CASCADE 1 CORPORAT	NATURAL GAS TON	
7	Request for a	General Rate Revision	
8	I, Ma	tt Muldoon, declare under penalty	of perjury under the laws of the State of Oregon:
9	1.	My name is Matt Muldoon. I ar	n employed as a Senior Economist in the Energy
10	Rates, Financ	ce and Audit Division of the Public	c Utility Commission of Oregon.
11	2.	I prepared Opening Testimony a	and a Witness Qualification Statement for the
12	above-captio	ned docket, previously submitted	as Staff Exhibits 200 and 201.
13	3.	My pre-filed Opening Testimon	y and the statements in my Witness Qualification
14	Statement (S	taff/200, Staff/201) are true and ac	ccurate.
15	I hereby declare that the above statements are true to the best of my knowledge and belie		
16	and that I un	derstand my testimony will be used	d as evidence before the Public Utility
17	Commission	of Oregon and is subject to penalt	y for perjury.
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19		Si	gned: //www.
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1		IC UTILITY COMMISSION OREGON	
2	1	UG 305	
3			
4	In the Matter of	DECLARATION OF MAX ST. BROWN	
5 6	CASCADE NATURAL GAS CORPORATION		
7	Request for a General Rate Revision		
8	I, Max St. Brown, declare under pena	lty of perjury under the laws of the State of Oregon:	
9	1. My name is Max St. Brown.	am employed as a Senior Utility Economist in the	
10	Energy Rates, Finance and Audit Division of	the Public Utility Commission of Oregon.	
11	2. I prepared Opening Testimony	and a Witness Qualification Statement for the	
12	above-captioned docket, previously submitted	d as Staff Exhibits 300 and 301.	
13	3. My pre-filed Opening Testimo	ony and the statements in my Witness Qualification	
14	Statement (Exhibits Staff/300 and Staff/301)	are true and accurate.	
15	I hereby declare that the above statements are true to the best of my knowledge and believe		
16	and that I understand my testimony will be us	sed as evidence before the Public Utility	
17	Commission of Oregon and is subject to pena	alty for perjury.	
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19		Signed: Max lt from	
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1	BEFORE THE PUBLIC UTILITY COMMISSION		
2	OF OREGON		
3	UG 305		
4	In the Matter of		
5		ATION OF	
6	,	OLVILLE	
7	Request for a General Rate Revision		
8			
9	L'EDIV COLVILLE de deux verdès sere eltre ef e colorer verden the	laire of the State of	
10	I, ERIK COLVILLE, declare under penalty of perjury under the	laws of the State of	
11	Oregon:	G	
12	1. My name is Erik Colville. I am employed by the Public Utility (
13	as a Senior Utility Analyst in the Utility Program's Energy Resources and Planning		
14	Division.		
15	2. I am the same Erik Colville who prepared Staff Testimony previously filed in this		
16	docket as Staff Exhibit/400. I also prepared my witness qualification	ation statement and	
17	exhibits, previously filed as Staff Exhibit/401-403.		
18	3. My testimony, witness qualification statement, and exhibits are t	rue and accurate based	
19	on my knowledge and belief.		
	I hereby declare that the above statement is true to the best of my	knowledge and belief,	
20	and that I understand it is made for use as evidence before the Public Uti	ility Commission of	
21	Oregon and is subject to penalty for perjury.		
22	SIGNED this 5 day of September, 2016 at Salem, Oregon.		
23	× √ .	1.11.	
24	Signed: 2 L	ohll	
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1	OF OREGON	SSION
2	UG 305	
3		OF SCOTT GIBBENS
4		OF SCOTT GIDDENS
5	CORPORATION	
6 7	Request for a General Rate Revision	
8	I, Scott Gibbens, declare under penalty of perjury under the la	aws of the State of Oregon:
9	1. My name is Scott Gibbens. I am employed as an Eco	nomist in the Energy Rates,
10	Finance and Audit Division of the Public Utility Commission of Ore	gon.
11	2. I prepared Opening Testimony and a Witness Qualific	cation Statement for the
12	above-captioned docket, previously submitted as Staff Exhibits 500	and 501.
13	3. My pre-filed Opening Testimony and the statements i	n my Witness Qualification
14	Statement (Exhibits Staff/500 and Staff/501) are true and accurate.	
15	I hereby declare that the above statements are true to the best	of my knowledge and belief
16	and that I understand my testimony will be used as evidence before t	he Public Utility
17	Commission of Oregon and is subject to penalty for perjury.	01
18	Q 41	
19	Signed:	u
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1		IC UTILITY COMMISSION OREGON
2		UG 305
3		DECLARATION OF KATHY ZARATE
4	In the Matter of	
5	CASCADE NATURAL GAS CORPORATION	
6	Request for a General Rate Revision	
7	Request for a General Rate Revision	
8	I, Kathy Zarate, declare under penalt	y of perjury under the laws of the State of Oregon:
9	1. My name is Kathy Zarate. I a	um employed as an Economist in the Energy Rates,
10	Finance and Audit Division of the Public Ut	ility Commission of Oregon.
11	2. I prepared Opening Testimon	y and a Witness Qualification Statement for the
12	above-captioned docket, previously submitte	ed as Staff Exhibits 600 and 601.
13	3. My pre-filed Opening Testim	ony and the statements in my Witness Qualification
14	Statement (Exhibits Staff/600 and Staff/601)	are true and accurate.
15	I hereby declare that the above staten	nents are true to the best of my knowledge and belief
16	and that I understand my testimony will be u	sed as evidence before the Public Utility
17	Commission of Oregon and is subject to pen	alty for perjury.
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19		Signed:
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1		LIC UTILITY COMMISSION F OREGON	
2		UG 305	
3		DECLARATION OF MITCHELL MOORE	
4	In the Matter of		
5	CASCADE NATURAL GAS CORPORATION		
6	Request for a General Rate Revision		
7			
8	I, Mitchell Moore, declare under per	nalty of perjury under the laws of the State of Oregon:	
9	1. My name is Mitchell Moore.	I am employed as a Senior Utility Analyst in the	
10	Energy Rates, Finance and Audit Division of	of the Public Utility Commission of Oregon.	
11	2. I prepared Opening Testimo:	ny and a Witness Qualification Statement for the	
12	above-captioned docket, previously submitt	ed as Staff Exhibits 700 and 701.	
13	3. My pre-filed Opening Testin	nony and the statements in my Witness Qualification	
14	Statement (Exhibits Staff/700 and Staff/701) are true and accurate.	
15	I hereby declare that the above statements are true to the best of my knowledge and belief		
16	and that I understand my testimony will be	used as evidence before the Public Utility	
17	Commission of Oregon and is subject to per	nalty for perjury.	
18		MAAD	
19		Signed: // W	
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1			UTILITY COMMISSION REGON	
2		U	G 305	
4	In the Matte	rof	DECLARATION OF SCOTT SHEARER	
5			DECLARATION OF SCOTT SHEAREN	
6	CASCADE NATURAL GAS CORPORATION			
7	Request for	a General Rate Revision		
8	I, Sco	ott Shearer, declare under penalty o	of perjury under the laws of the State of Oregon:	
9	1.	My name is Scott Shearer. I am	employed as a Senior Compliance Specialist in	
10	the Consume	er Services Section of the Public U	tility Commission of Oregon.	
11	2.	I prepared Opening Testimony a	nd a Witness Qualification Statement for the	
12	above-captic	oned docket, previously submitted a	as Staff Exhibits 800 and 801.	
13	3. My pre-filed Opening Testimony and the statements in my Witness Qualification			
14	Statement (Exhibits Staff/800 and Staff/801) are true and accurate.			
15	I hereby declare that the above statements are true to the best of my knowledge and belief			
16	and that I un	derstand my testimony will be used	l as evidence before the Public Utility	
17	Commission of Oregon and is subject to penalty for perjury.			
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1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON		
2	UG 305		
3			
4	In the Matter of DECLARATION OF MING PENG		
5 6	CASCADE NATURAL GAS CORPORATION		
7	Request for a General Rate Revision		
8	I, Ming Peng, declare under penalty of perjury under the laws of the State of Oregon:		
9	1. My name is Ming Peng. I am employed as a Senior Economist in the Energy		
10	Rates, Finance and Audit Division of the Public Utility Commission of Oregon.		
11	2. I prepared Opening Testimony and a Witness Qualification Statement for the		
12	above-captioned docket, previously submitted as Staff Exhibits 900 and 901.		
13	3. My pre-filed Opening Testimony and the statements in my Witness Qualification		
14	Statement (Exhibits Staff/900 and Staff/901) are true and accurate.		
15	I hereby declare that the above statements are true to the best of my knowledge and belie		
16	and that I understand my testimony will be used as evidence before the Public Utility		
17	Commission of Oregon and is subject to penalty for perjury.		
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19	Signed: Ming leng		
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1	1 BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON 2 UG 305				
2					
3					
4	In the Matter of DECLARATION OF LANCE KAUFMAN				
5	CASCADE NATURAL GAS CORPORATION Request for a General Rate Revision				
6 7					
8	I, Lance Kaufman, declare under penalty of perjury under the laws of the State of				
9	Oregon:				
10	1. My name is Lance Kaufman. I am employed as a Senior Economist in the Energy				
11	Rates, Finance and Audit Division of the Public Utility Commission of Oregon.				
12	2. I prepared Opening Testimony and a Witness Qualification Statement for the				
13	above-captioned docket, previously submitted as Staff Exhibits 1000 and 1001.				
14	3. My pre-filed Opening Testimony and the statements in my Witness Qualification				
15	Statement (Exhibits Staff/1000 and Staff/1001) are true and accurate.				
16	I hereby declare that the above statements are true to the best of my knowledge and belief				
17	and that I understand my testimony will be used as evidence before the Public Utility				
18	Commission of Oregon and is subject to penalty for perjury.				
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20	Signed:				
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1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON				
2	2 UG 305				
3		DECLARATION OF JEAN-PIERRE			
4	In the Matter of	BATMALE			
5	CASCADE NATURAL GAS CORPORATION				
6	Request for a General Rate Revision				
7	Request for a General Rate Revision				
8	I, Jean-Pierre (JP) Batmale, declare under penalty of perjury under the laws of the State				
9	of Oregon:				
10	1. My name is Jean-Pierre (JP) Batmale. I am employed as a Senior Utility Analys				
11	in the Energy Resources and Planning Division of the Public Utility Commission of Oregon.				
12	2. I prepared Opening Testimony and a Witness Qualification Statement for the				
13	above-captioned docket, previously submitted as Staff Exhibits 1200 and 1201.				
14	My pre-filed Opening Testimony and the statements in my Witness Qualification				
15	Statement (Exhibits Staff/1200 and Staff/1201) are true and accurate.				
16	I hereby declare that the above statements are true to the best of my knowledge and belie				
17	and that I understand my testimony will be used as evidence before the Public Utility				
18	Commission of Oregon and is subject to	penalty for perjury.			
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20		Signed: Datmat			
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1		CUTILITY COMMISSION OREGON		
2	Π_{c}	G 305		
3		DECLARATION OF GEORGE R. COMPTON		
4	In the Matter of			
5	CASCADE NATURAL GAS CORPORATION			
6 7	Request for a General Rate Revision			
8	I, George R. Compton, declare under penalty of perjury under the laws of the State of			
9	Oregon:			
10	1. My name is George R. Compton. I am employed as a Senior Economist in the			
11	Energy Rates, Finance, and Audit Division of the Public Utility Commission of Oregon.			
12	2. I prepared Opening Testimony and a Witness Qualification Statement for the			
13	above-captioned docket, previously submitted as Staff Exhibits 1300 and 1301.			
14	3. My pre-filed Opening Testimony and the statements in my Witness Qualification			
15	Statement (Exhibits Staff/1300 and Staff/1301) are true and accurate.			
16	I hereby declare that the above statements are true to the best of my knowledge and belief			
17	and that I understand my testimony will be used as evidence before the Public Utility			
18	Commission of Oregon and is subject to penalt	y for perjury.		
19		0 0 1		
20	Si	gned: Levige R Compton		
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1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON				
2			UG 305		
3					
4	In the Matter of		DECLARATION OF MARIANNE GARDNER		
5	or to or to be that I of the or to		RE: OPENING TESTIMONY OF JUDY JOHNSON		
6					
7	Request for a General Rate Revision				
8	I, Marianne Gardner, declare under penalty of perjury under the laws of the State of				
9	Oregon:				
10	1. My name is Marianne Gardner. I am employed as a Senior Revenue				
11	Requirements Analyst in the Energy Rates, Finance and Audit Division of the Public Utility				
12	Commission of Oregon.				
13	2. I have reviewed Opening Testimony drafted by Judy Johnson for the above-				
14	captioned docket, previously submitted as Staff Exhibit 1100.				
15	3. I adopt the Opening Testimony drafted by Judy Johnson as my own. To the best				
16	of my knowledge, the statements in Ms. Johnson's Opening Testimony (Exhibit Staff/1100) are				
17	true and accurate.				
18	I hereby declare that the above statements are true to the best of my knowledge and belief				
19	and that I understand my testimo	ny will be used as	evidence before the Public Utility		
20	Commission of Oregon and is subject to penalty for perjury.				
21					
22	Signed: Marianne Gardner				
23					
24					
25					
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Page	1 - DECLARATION OF MAR	IANNE GARDNI	ER RE: OPENING TESTIMONY OF JUDY		

Department of Justice 1162 Court Street NE Salem, OR 97301-4096 (503) 947-4520 / Fax: (503) 378-3784

JOHNSON