## BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 347

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

OF OREGON

UG 347

MOTION TO ADMIT PRE-FILED STAFF EXHIBITS

8 Staff of the Public Utility Commission of Oregon (Staff) asks the Administrative Law

Judge to admit the following pre-filed Staff Exhibits into the record in the above-captioned

10 docket:

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12	Exhibit No.	Exhibit
13	Staff Exhibit 100	Opening Testimony of Marianne Gardner
14	Staff Exhibit 101	Witness Qualification Statement of Marianne Gardner
15	Staff Exhibit 200	Opening Testimony of John L. Fox
16	Staff Exhibit 201	Witness Qualification Statement of John L. Fox
17	Staff Exhibit 202	Cascade Responses to Staff Data Requests
18	Staff Exhibit 300	Opening Testimony of Brian Fjeldheim
19	Staff Exhibit 301	Witness Qualification Statement of Brian Fjeldheim
20	Staff Exhibit 400	Opening Testimony of Scott Gibbens
21	Staff Exhibit 401	Witness Qualification Statement of Scott Gibbens
22	Staff Exhibit 402	Cascade Forecast Model Design Document
23	Staff Exhibit 500	Opening Testimony of Deborah Glosser
24	Staff Exhibit 600	Opening Testimony of Mitchell Moore
25	Staff Exhibit 601	Witness Qualification Statement of Mitchell Moore

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Page 1 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 347) JMR//pjr/9438544

1	Staff Exhibit 700	Opening Testimony of Sabrinna Soldavini
2	Staff Exhibit 701	Witness Qualification Statement of Sabrinna Soldavini
3	Staff Exhibit 702	Cascade 2017 Cost Allocation Manual
4	Staff Exhibit 703	Cascade 2015 Cost Allocation Manual
5	Staff Exhibit 704	NARUC Guidelines for Cost Allocations and Affiliate Transactions
6	Staff Exhibit 705	Cascade Data Request Responses
7	Staff Exhibit 800	Opening Testimony of Paul Rossow
8	Staff Exhibit 801	Witness Qualification Statement of Paul Rossow
9	Staff Exhibit 900	Opening Testimony of Jeffrey Watson
10	Staff Exhibit 901	Witness Qualification Statement of Jeffrey Watson
11	Staff Exhibit 902	Workpaper and Analysis of Pension Expense
12	Staff Exhibit 903	Workpaper and Analysis of Medical Benefit Expenses
13	Staff Exhibit 1000	Opening Testimony of Kathy Zarate
14	Staff Exhibit 1001	Witness Qualification Statement of Kathy Zarate
15	Staff Exhibit 1002	Cascade Responses to Data Requests
16	Staff Exhibit 1100	Opening Testimony of Ming Peng
17	Staff Exhibit 1101	Witness Qualification Statement of Ming Peng
18	Staff Exhibit 1102	Cascade Responses to Data Requests
19	Staff Exhibit 1200	Testimony of John L. Fox in Support of Stipulation
20	Staff Exhibit 1201	Summary of Proposed Gross Plant Adjustments
21	Staff Exhibit 1202	Cascade Response to Staff Data Requests
22	Staff Exhibit 1300	Testimony of Matt Muldoon and Jeffrey Watson in Support of Stipulation
23	Staff Exhibit 1301	Witness Qualification Statement of Matthew Muldoon
24	Staff Exhibit 1302	Updated Witness Qualification Statement of Jeffrey Watson
25	Staff Exhibit 1303	Staff Three-Stage DCF Peer Screening
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Page 2 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 347) JMR//pjr/9438544

1	Staff Exhibit 1304	Staff Three-Stage DCF ROE Screening
2	Staff Exhibit 1305	Staff Simple Single-Stage DCF ROE Screening
3	Staff Exhibit 1306	Staff Capital Asset Pricing Model ROE Modeling
4	Staff Exhibit 1307	Long Run 10-30 Year Gross Domestic Product (GDP) Growth
5	Staff Exhibit 1308	Long Run Real GDP Growth Rates with BEA Data
6	Staff Exhibit 1309	CONFIDENTIAL – Cost of LT Debt Table & Maturity Profile
7	Staff Exhibit 1310	News that Investors are Seeing

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9	This Motion to Admit Pre-Filed Staff Exhibits is supported by Declarations of Staff
10	witnesses Brian Fjeldheim, John L. Fox, Marianne Gardner, Scott Gibbens, Mitchell Moore,
11	Matthew J. Muldoon, Ming Peng, Paul Rossow, Sabrinna Soldavini, Jeffrey Watson and Kathy
12	Zarate that attest to the truthfulness of their testimony. The Declarations are attached to this
13	motion.
14	DATED this day of February 2019.
15	Respectfully submitted,
16	ELLEN F. ROSENBLUM
17	Attorney General
18	Jan Ruman
19	Johanna M. Riemenschneider, #990083

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Page 3 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 347) JMR//pjr/9438544

Senior Assistant Attorney General

Commission of Oregon

Of Attorneys for Staff of the Public Utility

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
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3	UG 347
4	In the Matter of )
5	CASCADE NATURAL GAS ) CORPORATION ) DECLARATION OF
6 7	Request for a General Rate Revision  )  BRIAN FJELDHEIM )
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9	I, Brian Fjeldheim, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Financial Analyst for the Public Utility Commission of Oregon
11	Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 300 and Staff Exhibit 301 (witness qualification statement).
14	3. I have reviewed and also adopt testimony drafted by Staff witness Deborah
15	Glosser, pre-filed as Staff Exhibit 500.
16	3. To the best of my knowledge, my pre-filed testimony, adopted testimony and
17	witness qualification statement are true and accurate.
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19	I hereby declare that the above statement is true to the best of my knowledge and
20	belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.
21	
22	SIGNED this 31 day of January 2019.
23	Dian Fieldlein
24	BRIAN FJELDHEIM
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Page 1 - UG 347 - DECLARATION OF BRIAN FJELDHEIM JLM/pjr//9418037

## BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2 **UG 347** 3 In the Matter of 4 CASCADE NATURAL GAS 5 **CORPORATION DECLARATION OF** JOHN L. FOX 6 Request for a General Rate Revision 7 8 9 I, John L. Fox, state the following, under penalty of perjury in the State of Oregon: 10 I am a Senior Financial Analyst for the Public Utility Commission of Oregon 1. 11 Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division. 12 2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 200 and Staff Exhibit 201 (witness qualification statement). 13 14 3. Also on behalf of Staff, I drafted Staff testimony in support of the Stipulation pre-15 filed in this docket as Staff Exhibit 1200. 16 To the best of my knowledge, my pre-filed testimony and my witness 17 qualification statement are true and accurate. 18 I hereby declare that the above statement is true to the best of my knowledge and 19 belief, and that I understand it is made for use as evidence in court and is subject to 20 penalty for perjury. 21 SIGNED this 30 day of January 2019. 22 23 JOHN L. FOX 24 25 26

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

UG 347 - DECLARATION OF JOHN L. FOX

Page 1 -

JLM/pjr//9418035

## BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON UG 347 3 In the Matter of CASCADE NATURAL GAS CORPORATION DECLARATION OF MARIANNE GARDNER Request for a General Rate Revision I, Marianne Gardner, state the following, under penalty of perjury in the State of Oregon: 10 1. I am a Program Manager for the Public Utility Commission of Oregon Staff 11 ("Staff"). I work in the Energy Rates, Finance and Audit Division. 12 2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use is 13 this docket as Staff Exhibit 100 and Staff Exhibit 101 (witness qualification statement) 14 3. On behalf of Staff, I sponsored the pre-filed joint testimony submitted for use in 15 this docket in support of the Stipulation entitled Stipulating Parties/Parvinen et al (Exhibit 16 Stipulating Parties/100). 17 To the best of my knowledge, my pre-filed testimony and witness qualification 18 statement are true and accurate. 19 I hereby declare that the above statement is true to the best of my knowledge and 20 belief, and that I understand it is made for use as evidence in court and is subject to 21 penalty for perjury. 22 SIGNED this 3 day of February 2019. 23 24 25 26

Page 1 - UG 347 - DECLARATION OF MARIANNE GARDNER
JLM/pjr//9418032

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
UG 347
In the Matter of )
CASCADE NATURAL GAS CORPORATION  DECLARATION OF
) SCOTT GIBBENS Request for a General Rate Revision )
I, Scott Gibbens, state the following, under penalty of perjury in the State of Oregon:
1. I am a Senior Economist for the Public Utility Commission of Oregon Staff
("Staff"). I work in the Energy Rates, Finance and Audit Division.
2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
this docket as Staff Exhibit 400 and Staff Exhibit 401 (witness qualification statement).
3. To the best of my knowledge, my pre-filed testimony and witness qualification
statement are true and accurate.
I hereby declare that the above statement is true to the best of my knowledge and
belief, and that I understand it is made for use as evidence in court and is subject to
penalty for perjury.
SIGNED this 3 day of January 2019.
SIGNED this 51 day of January 2019.
SCOTT GIBBENS

Page 1 - UG 347 - DECLARATION OF SCOTT GIBBENS JLM/pjr//9418391

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 347
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4	In the Matter of )
5	CASCADE NATURAL GAS ) CORPORATION ) DECLARATION OF
6	Request for a General Rate Revision ) MITCHELL MOORE )
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9	I, Mitchell Moore, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Utility Analyst for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 600 and Staff Exhibit 601 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
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17 18	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.
19	politicy for perjury.
20	SIGNED this 31 day of January 2019.
21	Partie & J
22	MITCHELL MOORE
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Page 1 - UG 347 - DECLARATION OF MITCHELL MOORE JLM/pjr//9418412

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
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3	UG 347
4	In the Matter of )
5	CASCADE NATURAL GAS CORPORATION  DECLARATION OF
6 7	Request for a General Rate Revision  ) MATTHEW J. MULDOON )
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9	I, Matthew J. Muldoon, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Economist for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I co-drafted Staff testimony in support of the Stipulation pre-
13	filed in this docket as Staff Exhibit 1300 and drafted Staff Exhibit 1301 (witness qualification
14	statement).
15	3. To the best of my knowledge, my pre-filed testimony and witness qualification
16	statement are true and accurate.
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18	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to
19	penalty for perjury.
20	SIGNED this 30 day of January 2019.
21	Mutthe multiple of sandary 2019.
22	MATTHEW J. MULDOON
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Page 1 - UG 347 - DECLARATION OF MATTHEW J. MULDOON JLM/pjr//9418537

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
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3	UG 347
4	In the Matter of )
5	CASCADE NATURAL GAS  CORPORATION  DECLARATION OF
6 7	Request for a General Rate Revision  ) MING PENG )
8	
9	I, Ming Peng, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Economist for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 1100 and Staff Exhibit 1101 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
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17	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to
18	penalty for perjury.
19	s Atu.
20	SIGNED this $\frac{27}{4}$ day of January 2019.
21	MING PENG
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Page 1 - UG 347 - DECLARATION OF MING PENG JLM/pjr//9418522

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
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3	UG 347
4	In the Matter of )
5	CASCADE NATURAL GAS  CORPORATION  DECLARATION OF
6 7	Request for a General Rate Revision  ) PAUL ROSSOW )
8	
9	I, Paul Rossow, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Utility Analyst for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Resources and Planning Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 800 and Staff Exhibit 801 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
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17	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to
18	penalty for perjury.
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20	SIGNED this $\frac{29}{}$ day of January 2019.
21	Paul Rossow
22	PAUL ROSSOW
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Page 1 - UG 347 - DECLARATION OF PAUL ROSSOW JLM/pjr//9418482

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
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3	. UG 347
4	In the Matter of )
5	CASCADE NATURAL GAS CORPORATION DECLARATION OF
6	) SABRINNA SOLDAVINI Request for a General Rate Revision )
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9	I, Sabrinna Soldavini, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Utility Economist for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 700 and Staff Exhibit 701 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
16	
17 18	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.
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20	SIGNED this 30th day of January 2019.
21	SABRINA SOLDAVINI
22	DADINIA BOLDIVINI
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25	n
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Page	1 - UG 347 - DECLARATION OF SABRINNA SOLDAVINI JLM/pjr//9418419

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

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 347
3	
4	In the Matter of )
5	CASCADE NATURAL GAS ) CORPORATION ) DECLARATION OF
6 7	Request for a General Rate Revision ) JEFFREY WATSON )
8	
9	I, Jeffrey Watson, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Consumer Services Analyst for the Public Utility Commission of Oregon
11	Staff ("Staff"). I currently work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 900 and Staff Exhibit 901 (witness qualification statement).
14	3. Also on behalf of Staff, I co-drafted Staff testimony in support of the Stipulation
15	filed in this docket as Exhibit 1300 and drafted Staff Exhibit 1302 (updated witness qualification
16	statement).
17	4. To the best of my knowledge, my pre-filed testimony and witness qualification
18	statements are true and accurate.
19	
20	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to
21	penalty for perjury.
22	$\sim \mathcal{H}$
23	SIGNED this day of February 2019.
24	11/1/10
25	JEFFREY WATSON
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Page 1 - UG 347 - DECLARATION OF JEFFREY WATSON JLM/pjr//9418491

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 347
3	
4	In the Matter of )
5	CASCADE NATURAL GAS ) CORPORATION ) DECLARATION OF
6 7	Request for a General Rate Revision  ) KATHY ZARATE )
8	
9	I, Kathy Zarate, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Utility Economist for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 1000 and Staff Exhibit 1001 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
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18	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to
19	penalty for perjury.
20	SIGNED this 31 day of January 2019.
21	SIGNED this 51 day of January 2019.
22	KATHY ZARATE
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Page 1 - UG 347 - DECLARATION OF KATHY ZARATE JLM/pjr//9418508