

ITEM NO. CA13


PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: October 19, 2015

REGULAR _____ CONSENT X EFFECTIVE DATE November 1, 2015

DATE: October 9, 2015

TO: Public Utility Commission

FROM: Mitchell Moore 

THROUGH: Jason Eisdorfer and Marc Hellman 

SUBJECT: CASCADE NATURAL GAS: (Docket No. UM 1558(4)) Requests reauthorization to defer Purchased Gas Cost differences.

STAFF RECOMMENDATION:

I recommend the Commission approve Cascade Natural Gas' (Cascade or Company) application to defer purchased gas cost differences for the 12-month period beginning November 1, 2015.

ISSUE:

Cascade requests reauthorization to use deferred accounting to track actual purchased gas costs for later true-up in the Company's Purchased Gas Adjustment (PGA) mechanism.

RULE:

The PGA mechanism was originally established by the Commission in Order No. 89-1046 to minimize the frequency of gas cost-related rate changes and the fluctuation of rate levels in accordance with ORS 757.259(2)(e). Under the PGA, utilities defer actual purchased gas costs for a twelve-month period, and then amortize the variance between actual and forecasted costs, subject to sharing. See OAR 860-027-0070.

ANALYSIS:

Description of Expense

The purpose of this deferral is to account for the monthly difference between gas costs expected to be collected from customers and gas costs actually collected, as set forth in Schedule No. 177 – Purchased Gas Cost Adjustment Provision – Oregon. The monthly differences arise because the rates associated with gas costs are calculated using forecasted gas prices and therms. A request to amortize the accumulated deferral is made annually, effective November 1.

Proposed Accounting

The Company proposes to continue deferring to sub-accounts of FERC Account 253 for subsequent distribution to, or collection from, customers consistent with the dictates of the PGA methodology. Gas cost differences will be segregated between commodity-related and demand-related cost differences. Absent deferred accounting, the charges incurred for gas costs would be recorded using standard accounting procedures and customers would not incur the benefits or costs associated with changes in the cost of gas.

Estimated Deferrals in Authorization Period

The goal of the PGA mechanism is to match gas costs incurred by the Company with gas costs included in customer rates. Any differences are the result of unexpected weather or volatility in gas prices, thereby making an accurate estimation of the deferred amount unlikely.

Information Related to Future Amortization

- Earnings Review – An annual spring earnings review will be conducted pursuant to OAR 860-022-0070.
- Prudence Review – Prior to amortization, a prudence review will be conducted. The review should include verification of the accounting methodology used to determine the final amortization balance.
- Sharing – Due to the Company's previous sharing election related to the 2014-2015 PGA year, 90 percent of the difference between actual commodity costs and the commodity costs collected from customers will be deferred. Cascade will absorb the other 10 percent. The commodity portion of purchased gas cost differences include purchasing natural gas, the variable cost of transporting the gas from the supply basin to the citygate, the benefits received from storage optimization, off-system sales, and other miscellaneous costs or benefits.

- One hundred percent of the demand portion of the purchased gas cost differences will be deferred. The demand portion includes fixed pipeline costs, capacity releases, and miscellaneous pipeline related refunds or surcharges.
- Rate Spread/Design – Prudently incurred gas cost differences that have been correctly accounted for should be developed into a rate per therm based on estimated usage for the upcoming PGA year.
- Three Percent Test (ORS 757.259(6)) – The three percent test measures the annual overall average effect on customer rates resulting from deferral amortizations. The three percent test limits (exceptions at ORS 757.259(7) and (8)) the aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's gross revenues for the preceding year.
- This deferral is subject to the exception at ORS 757.259(7) that allows the Commission to consider an overall average rate impact greater than that specified in subsection (6) for natural gas commodity and pipeline transportation costs incurred by a natural gas utility, if the commission finds that allowing a higher amortization rate is reasonable under the circumstances.

CONCLUSION:

Cascade's filing represents an appropriate use of deferred accounting under ORS 757.259. Further, the Company's application for reauthorization of deferred accounting meets the requirements related to the establishment of the PGA mechanism, as well as the requirements of ORS 757.259 and OARS 860-027-0300, and should be approved.

PROPOSED COMMISSION MOTION:

Cascade's application for reauthorization to defer gas cost-related differences associated with the PGA mechanism be approved for accounting purposes for the 12-month period beginning November 1, 2015.