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December 11, 2015

Records Center  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
Olympia, WA 98504

Re: U-144155 – Cascade Natural Gas’s Comments

Cascade Natural Gas Corporation’s (Cascade’s or Company’s) files the following comments in response to in the Washington Utilities and Transportation Commission’s (WUTC’s or Commission’s) Notice of Opportunity to Submit Written Comments On Proposed Rules, issued on November 20, 2015, in Docket No. U-144155.

Cascade Natural Gas has participated in the subject docket by attending workshops, providing data, and submitting written comments. At this time, Cascade provides final comments on the draft rules set for adoption at the January 21, 2016, hearing.

The Company believes the proposed rules are, in general, workable and will achieve the intended purpose of limiting the impact corrected under-billings pose to affected customers. However, the Company believes the wording of proposed sections (4)(a) of WAC 480-90-178 and WAC 480-100-178, is fundamentally incorrect. The draft rules states:

*Upon discovery of an underbilling or overbilling resulting from a meter failure, meter malfunction, meter with unassigned energy usage, or any other billing errors. . .*

A bill is not issued for meters that have no customer of record for the premise. It is incorrect to say that a meter with unassigned usage will be identified through a billing. Unassigned energy usage is identified through the examination of meter readings. Also, the same referenced sentence inappropriately identifies unidentified energy usage as a billing error: “unassigned energy usage, or any other billing errors.” Again, since bills are not automatically generated for

sites with no active account and no customer of record, unassigned energy is not a billing error. It is more aptly defined as theft. Finally, section (4)(a) says utilities must issue "customers with a corrected bill." Again, with unassigned energy usage, there is no customer and no incorrect bill. We believe the wording of section (4)(a) needs to be reconsidered. Staff's Comment Summary says unassigned energy usage is "easy to detect and correct." We agree but that does not address the issue that it is incorrectly discussed in section (4)(a). The definition of unassigned usage in section (4)(b)(ii) does not alleviate the error in (4)(a).

Other than this needed correction, the Company supports the rule and appreciates Staff's work in bringing this process to an agreeable conclusion.

If you have any questions regarding this report, please contact Jennifer Gross at (509) 734-4635.

Sincerely,



Michael Parvinen  
Director, Regulatory Affairs