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February 25, 2025

Jeff Killip  
Executive Director and Secretary  
Washington Utilities & Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

**RE: UG-240008, Advice No. W24-02-01, Cascade Multi-Year Rate Plan Compliance Filing**

Director Killip

Cascade Natural Gas Corporation ("Cascade" or "Company") submits the attached filing in compliance with Commission Order No. 05 ("Final Order 05") issued in Cascade's multi-year rate plan ("MYRP") docketed as UG-240008. Attached are the following revisions to Cascade's Tariff WN U-3, stated to become effective March 4, 2025, which is in compliance with ¶158 of Final Order 05 that states "the compliance filing tariff sheets must allow five business days after the date of filing for Commission review."

Tariff Sheet	Sch/Rule	Title
Seventeenth Revision of Sheet No. 12	Rule 8	Extension of Distribution Facilities
Ninth Revision of Sheet No. 12-A	Rule 8	Extension of Distribution Facilities
Twelfth Revision of Sheet No. 25	Rule 21	Decoupling Mechanism
First Revision of Sheet No. 25-A	Rule 21	Decoupling Mechanism
Second Revision of Sheet No. 25-B	Rule 21	Decoupling Mechanism
Fourteenth Revision of Sheet No. 302	Sch. 302	CARES Discount Rates
Sixty-Ninth Revision of Sheet No. 503	Sch. 503	Residential Service Rate
Fifty-Third Revision of Sheet No. 504	Sch. 504	General Commercial Service Rate
Fifty-Second Revision of Sheet No. 505	Sch. 505	General Industrial Service Rate
Seventieth Revision of Sheet No. 511	Sch. 511	Large Volume General Service
Original Sheet No. 555	Sch. 555	Commission Fee Adjustment
Original Sheet No. 556	Sch. 556	COVID-19 Cost Recovery Adjustment
Sixty-Fourth Revision of Sheet No. 570	Sch. 570	Interruptible Service
Seventeenth Revision of Sheet No. 597	Sch. 597	Cost Recovery Mechanism
Twenty-Second Revision of Sheet No. 663	Sch. 663	Distribution System Transportation Service
Thirteenth Revision of Sheet No. 663	Sch. 663	Distribution System Transportation Service

Final Order 05 approves a two-year rate plan that increases Cascade’s revenues by \$29.8 million or 7.88 percent starting March 4, 2025, and \$10.8 million or 2.64 percent starting March 1, 2026.

This compliance filing revises all rate schedule basic service charges, volumetric charges, and terms and conditions as approved per Commission in Final Order 05. The enclosed Tariff changes also include the addition of adjustment Schedule 555 Commission Fee Adjustment and Schedule 556, COVID-19 Cost Recovery Adjustment, as well as the zeroing out of the charges for Schedule 597, Cost Recovery Mechanism for Elevated-Risk Pipeline Facility Replacements and changes to the Company’s line extension allowance as detailed in Rule 8, Extension of Distribution Facilities.

The attached work paper, UG-240008-CNGC-MYRP-Compliance-WP1-02-25-2025.xlxs, presents customer rates, as well as rates for the COVID-19 Cost Recovery Adjustment and the Commission Fee Adjustment, and decoupling margins.

A second work paper, UG-240008-CNGC-MYRP-Compliance-WP2-02-25-2025.xlxs, is provided in compliance with the terms set forth in Witness Daniel L. Tillis’s Direct Testimony (Exh. DLT-1T) that states that the Company will analyze the energy burden that customers participating in the Cascade Arrearage Relief and Energy Savings (“CARES”) program will experience with the final rates adopted in UG-240008 and will revise the five tiers of discounts offered per Schedule 302, Cascade Arrearage Relief Energy Savings (CARES) Discount Rates, such that each tier is designed to result in limiting a participating customer’s energy burden to between 3.0 and 3.5 percent. The 3.0 to 3.5 percent energy burden is the goal adopted by Cascade’s CARES Advisory Group and stated in Schedule 302, as approved by the Commission in UG-230551. The energy burden analysis takes a residential customer’s average annual bill after the MYRP rate increase of approximately 8% and then divides this number by the appropriate percentage of the 2025 Federal Poverty Level for each CARES discount tier. To keep customers within a 3.0 to 3.5% energy burden, tiers 2, 3, and 4 are increased. Table 1 below presents the proposed changes to the discounts offered as well as the final energy burden for each tier.

*Table 1 - CARES Discounts and Energy Burdens*

<b>Sch. 302 Tier</b>	<b>Current Discount</b>	<b>Discount as of 3-4-2025</b>	<b>Difference</b>	<b>Energy Burden after Discount as of 3-4-2025</b>
1	90%	90%	0.00%	3.1%
2	71%	75%	4.00%	3.1%
3	40%	50%	10.00%	3.1%
4	15%	25%	10.00%	3.1%
5	8%	8%	0.00%	2.8%

In compliance with ¶151 of Final Order 05, Cascade provides the customer bill impacts by customer class, including both the percentage increase to billed rates for all customer classes and the dollar increase per month for the average residential customer. Table 2 below illustrates the proposed changes effective in Rate Year 1 (March 4, 2025), and Rate Year 2 (March 1, 2026)

Table 2 - Rate Impacts of Rate Schedule Changes

Customer Class	Rates in Effect at Original filing date	Rate Effective March 4, 2025	Rate Effective March 1, 2026
<b>Residential - 503</b>			
Basic Service Charge	\$5.00	\$5.50	\$6.00
Delivery Charge	\$0.33951	\$0.45648	\$0.48600
Cost Recovery Mechanism	\$0.01769	\$0.00000	\$0.00000
<b>Commercial - 504</b>			
Basic Service Charge	\$13.00	\$20.00	\$25.50
Delivery Charge	\$0.28432	\$0.35239	\$0.36206
Cost Recovery Mechanism	\$0.01096	\$0.00000	\$0.00000
<b>Industrial - 505</b>			
Basic Service Charge	\$60.00	\$100.00	\$130.00
Delivery Charge - first 500 therms	\$0.21929	\$0.26864	\$0.27398
Delivery Charge - next 3,500 therms	\$0.17998	\$0.22241	\$0.22683
Delivery Charge - over 4,000 therms	\$0.17404	\$0.21543	\$0.21971
Cost Recovery Mechanism	\$0.00915	\$0.00000	\$0.00000
<b>Large Volume - 511</b>			
Basic Service Charge	\$125.00	\$250.00	\$350.00
Delivery Charge - first 20,000 therms	\$0.17424	\$0.21508	\$0.22323
Delivery Charge - next 80,000 therms	\$0.13551	\$0.16871	\$0.17511
Delivery Charge - over 100,000 therms	\$0.03970	\$0.05401	\$0.05606
Cost Recovery Mechanism	\$0.00541	\$0.00000	\$0.00000
<b>Interruptible - 570</b>			
Basic Service Charge	\$163.00	\$300.00	\$400.00
Delivery Charge - first 30,000 therms	\$0.09838	\$0.12406	\$0.12815
Delivery Charge - over 30,000 therms	\$0.03301	\$0.04646	\$0.04799
Cost Recovery Mechanism	\$0.00613	\$0.00000	\$0.00000
<b>Transport - 663</b>			
Contract Demand	\$0.20	\$0.40	\$0.45
System Balancing Charge	\$0.00040	\$0.00110	\$0.00110
Basic Service Charge	\$625.00	\$1,000.00	\$1,200.00
Delivery Charge - first 100,000 therms	\$0.06463	\$0.05150	\$0.05029
Delivery Charge - next 200,000 therms	\$0.02542	\$0.02092	\$0.02043
Delivery Charge - next 200,000 therms	\$0.01659	\$0.01403	\$0.01370
Delivery Charge - over 500,000 therms	\$0.00941	\$0.00842	\$0.00822
Cost Recovery Mechanism	\$0.00139	\$0.00000	\$0.00000

Table 3 below summarizes the impact to customer bills after all rate changes have been made in compliance with Final Order 05, including the COVID-19 Cost Recovery Adjustment, the Commission Fee Adjustment, and the base rate increase proposed to become effective March 4, 2025. The final columns of the table show the combined bill impact of all three rate changes.

*Table 3 - Rate Impacts with Adjustment Schedules as of March 4, 2025*

<b>Table 3</b>								
<b>March 4, 2025</b>	<b>COVID-19</b>		<b>UTC Fees</b>		<b>Rate Case</b>		<b>Overall*</b>	
	<b>Bill</b>	<b>Bill</b>	<b>Bill</b>	<b>Bill</b>	<b>Bill</b>	<b>Bill</b>	<b>Bill</b>	<b>Bill</b>
<b>Service, Schedule No.</b>	<b>Difference</b>	<b>% Change</b>	<b>Difference</b>	<b>% Change</b>	<b>Difference</b>	<b>% Change</b>	<b>Difference</b>	<b>% Change</b>
Residential, Schedule 503	\$0.13	0.17%	\$0.17	0.23%	\$5.75	7.71%	\$6.04	8.12%
Commercial, Schedule 504	\$0.15	0.04%	\$0.58	0.16%	\$22.82	6.43%	\$23.55	6.63%
Industrial Firm, Schedule 505	\$1.11	0.05%	\$2.93	0.12%	\$111.67	4.66%	\$115.71	4.83%
Large Volume, Schedule 511	\$0.70	0.00%	\$14.89	0.09%	\$622.71	3.92%	\$638.30	4.02%
Industrial Interruptible, Schedule 570	\$0.75	0.00%	\$14.48	0.06%	\$625.19	2.44%	\$640.42	2.50%
Transport, Schedule 663	\$0.00	0.00%	\$88.59	0.61%	\$1,388.91	7.56%	\$1,477.50	8.04%

\*The sum of the components may be different than the Overall due to rounding.

Table 4 provides the bill impacts of rates proposed to become effective March 1, 2026. The average residential customer using 53 therms per month would see an overall monthly increase of \$6.04 in Rate Year 1, and \$2.06 in Rate Year 2. The average commercial customer using 277 therms per month would see an overall monthly increase of \$23.55 in Rate Year 1, and \$8.18 in Rate Year 2.

Table 4 - Rate Impacts with Adjustment Rates as of March 1, 2025

Table 4								
March 1, 2026	COVID-19		UTC Fees		Rate Case		Overall*	
	Bill	Bill	Bill	Bill	Bill	Bill	Bill	Bill
Service, Schedule No.	Difference	% Change	Difference	% Change	Difference	% Change	Difference	% Change
Residential, Schedule 503	\$0.00	0.00%	\$0.00	0.00%	\$2.06	2.57%	\$2.06	2.56%
Commercial, Schedule 504	\$0.00	0.00%	\$0.00	0.00%	\$8.18	2.16%	\$8.18	2.16%
Industrial Firm, Schedule 505	\$0.00	0.00%	\$0.00	0.00%	\$39.52	1.58%	\$39.52	1.57%
Large Volume, Schedule 511	\$0.00	0.00%	\$0.00	0.00%	\$214.49	1.30%	\$214.49	1.30%
Industrial Interruptible, Schedule 570	\$0.00	0.00%	\$0.00	0.00%	\$202.13	0.77%	\$202.13	0.77%
Transport, Schedule 663	\$0.00	0.00%	\$0.00	0.00%	\$872.84	4.42%	\$872.84	4.40%

\*Overall includes COVID-19 and UTC Fees revenue, which did not incrementally change from the prior year.

This electronic filing is comprised of the following files:

- UG-240008-CNGC-MYRP-Compliance-CLtr-02-25-2025.pdf
- UG-240008-CNGC-MYRP-Compliance-Trf-02-25-2024.pdf
- UG-240008-CNGC-MYRP-Compliance-Leg-02-25-2024.pdf
- UG-240008-CNGC-MYRP-Compliance-WP1-02-25-2025.xlsx
- UG-240008-CNGC-MYRP-Compliance-WP2-02-25-2025.xlsx

Please direct any questions regarding this filing to me at (208) 377-6015. Due to the compressed timeframe for review of this compliance filing, questions may also be emailed to CNGCRegulatory.com.

Sincerely,

/s/ Lori Blattner

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Attachments