

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,
Complainant,

DOCKET UG-170929

v.

CASCADE NATURAL GAS
CORPORATION,
Respondent.

CASCADE NATURAL GAS CORPORATION

EXHIBIT BR-11

BRIAN ROBERTSON

Staff Response to CNGC DR-6

March 23, 2018

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: March 9, 2018
DOCKET: UG-170929
REQUESTER: Cascade

WITNESS: Melissa Cheesman
RESPONDER: Melissa Cheesman
TELEPHONE: (360) 664-1251

REQUEST NO. 6:
RE: Load Study

Please list each gas utility in Washington that has completed or is required to complete a load study as described by Staff and the year in which the study was completed or is anticipated to be completed.

RESPONSE:

Objection. WAC 480-07-400(3).

Without waiving said objection, please see *Wash. Utils. & Transp. Comm'n v. Cascade Natural Gas Corp.*, Docket UG-152286, Order 04, Exhibit A: Joint Settlement Agreement (Jul. 7, 2016). Cascade is required to complete a load study as “described by Staff” because it agreed to do so in Docket UG-152286’s joint settlement agreement as part of a package of other compromises by the parties. The Commission approved that settlement without condition. The reason Staff negotiated for a load study is because Cascade does not track core class (residential, commercial and industrial) usage. This condition was part of the give and take in the negotiation of the joint settlement agreement. It is irrelevant what other companies’ obligations may be for load studies because those companies are not parties to the joint settlement agreement in Docket UG-152286. Regardless, PSE and Avista provided demand and actual usage information by schedule and by month for the duration of the test year in their recent general rate cases, Docket UG-170034 and Docket UG-170486, respectively. This information is critical for developing an informed and accurate cost of service study. Cascade is unable to provide the same demand and actual usage information as these companies, but a load study “as described by Staff” in this case and in the joint settlement agreement of Docket UG-152286 would suffice to inform an accurate cost of service study.