

**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-12

BRIAN ROBERTSON

Staff Response to CNGC DR-7

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. 7:
RE: Load Study

Please provide a copy of each load study supplied by each utility identified in the previous request.

RESPONSE:

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

Without waiving said objection, Staff will provide a copy of the load study ordered as part of the joint settlement agreement in Docket UG-152286 as soon as it is received. Please also see the responses to data requests received from PSE and Avista in Docket UG-170034 and Docket UG-170486, respectively, attached to this response. Please note that a load study from PSE or Avista does not inform the record about Cascade's service territory. A load study is only relevant to the company that prepares it because a load study represents the unique characteristics of customers at that time and in that specific service territory. Further, the methods by which a load study should be compiled were not at issue in other companies' cases because those companies' metering infrastructure has the capability to track demand natively. Cascade does not have this same capability.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-170033 and UG-170034
Puget Sound Energy
2017 General Rate Case**

WUTC STAFF DATA REQUEST NO. 110

WUTC STAFF DATA REQUEST NO. 110:

RE: Natural Gas Cost of Service

Please provide copies of the company's most recent Natural Gas Bill Frequency and Load Studies. This is a continuing request and should be supplemented if a new study is produced during the remainder of this proceeding.

Response:

Please see Attachment A to Puget Sound Energy's ("PSE") Response to WUTC Staff Data Request No. 110, which is an MS Excel file detailing PSE's most recent Natural Gas Bill Frequency Study that supports its 2017 General Rate Case. The Gas Bill Frequency Study only contains the bill frequency data for the rate schedules that have block rate structures. PSE does not develop or maintain Natural Gas Bill Frequency and Load Studies on a routine basis.

**ATTACHMENT A to PSE's Response to
WUTC Staff Data Request No. 110**

Provided Electronically Only

AVISTA CORP.
RESPONSE TO REQUEST FOR INFORMATION

JURISDICTION:	WASHINGTON	DATE PREPARED:	08/31/2017
CASE NO.:	UE-170485 & UG-170486	WITNESS:	Patrick Ehrbar/Joseph Miller
REQUESTER:	UTC Staff	RESPONDER:	Joe Miller
TYPE:	Data Request	DEPT:	State & Fed Regulation
REQUEST NO.:	Staff - 136	TELEPHONE:	(509) 495-4546
		EMAIL:	joe.miller@avistacorp.com

REQUEST:

Please provide copies of the Company's most recent Natural Gas Bill Frequency and Load Studies. This is a continuing request and should be supplemented if a new study is produced during the remainder of this proceeding.

RESPONSE:

See the attachment labeled "Staff_DR_136 Attachment A" for the most recent bill frequency analysis. See the workpapers for Company witness Mr. Miller labeled JDM-G-57 through JDM-G-61 for the demand study prepared for the natural gas cost of service study in this proceeding. An electronic copy of the demand study is attached as "Staff_DR_136 Attachment B".

Staff Response to Cascade DR 7

Attachment B

Avista Staff-136 Natural Gas		OCT_2014	NOV_2014	DEC_2014	JAN_2015	FEB_2015	MAR_2015	APR_2015	MAY_2015	JUN_2015	JUL_2015	AUG_2015	SEP_2015	OCT_2015	NOV_2015	DEC_2015
RATE_SCH	USAGE_BLOCK															
W101	01-10	43708	13148	5171	4576	5896	6531	9790	22191	58509	73395	77355	61286	44203	15081	5625
W101	11-20	40748	13221	2651	2288	3459	4487	9436	25467	46936	47213	47613	46359	41498	14473	2997
W101	21-30	29914	16278	2646	2244	3733	5423	13254	27236	25524	18473	16304	24915	31114	16756	2978
W101	30-40	16429	18017	3354	2592	5137	8699	18126	24001	10174	5916	4622	10026	17871	19337	3804
W101	41-50	7326	17185	4666	3522	7504	11841	21593	17921	3619	2027	1636	3637	8193	18406	5343
W101	51-60	3343	15705	6660	4774	10221	14940	20164	11972	1554	922	732	1525	3767	15894	7396
W101	61-70	1570	12755	8596	6366	13071	16838	16810	7504	842	507	429	728	1831	12854	9340
W101	71-80	853	10334	10724	8184	15401	16405	12598	4461	557	337	273	444	981	10277	11446
W101	81-90	492	8024	12526	10529	15184	14159	8782	2668	319	264	182	276	581	7476	12534
W101	91-100	309	6163	12560	11448	14360	11723	5592	1698	267	156	136	198	365	5409	12527
W101	101-110	216	4398	12322	11663	12878	8958	3732	1111	181	106	107	156	240	3812	11909
W101	111-120	157	3180	11242	11782	10588	7028	2417	705	159	100	73	131	182	2741	10785
W101	121-130	131	2324	9951	10491	8780	5199	1637	507	144	83	87	102	133	2024	9685
W101	131-140	126	1652	8140	9429	6808	3924	1198	338	111	74	77	87	112	1356	7824
W101	141-150	73	1187	6834	8104	5476	2734	839	295	95	57	68	93	103	1009	6373
W101	151-160	83	866	5637	6793	4110	2002	602	229	80	55	48	82	106	748	5201
W101	161-170	83	666	4541	5741	3228	1532	489	230	76	50	46	59	70	575	4362
W101	171-180	45	508	3602	4662	2520	1154	421	158	61	44	38	58	56	467	3289
W101	181-190	47	406	2844	3957	1868	867	354	128	46	21	41	50	50	349	2625
W101	191-200	42	301	2228	3049	1487	749	263	119	39	20	31	49	40	319	2022
W101	201-210	26	275	1827	2512	1286	608	193	101	42	23	28	33	34	256	1760
W101	211-220	34	210	1420	1966	967	469	180	82	40	14	16	34	36	188	1409
W101	221-230	35	158	1193	1647	777	397	162	74	29	10	23	41	19	157	1083
W101	231-240	22	125	941	1299	631	351	144	64	24	15	20	16	26	120	918
W101	241-250	23	136	832	1147	520	244	137	47	27	11	22	35	27	137	742
W101	251-260	11	144	658	941	474	230	95	45	18	9	14	24	21	103	632
W101	261-270	13	110	572	774	412	186	88	40	16	13	12	27	12	110	539
W101	271-280	16	90	457	667	339	189	91	40	16	8	7	26	15	75	398
W101	281-290	11	79	408	533	316	161	82	35	8	7	12	25	10	79	372
W101	291-300	10	70	326	488	276	147	77	36	16	4	12	19	7	65	354
W101	301-310	9	70	326	419	215	128	59	26	4	4	7	10	10	44	273
W101	311-320	12	44	272	366	200	113	70	20	6	4	8	12	11	45	251
W101	321-330	10	52	264	323	137	127	55	31	9	3	9	12	5	59	202
W101	331-340	5	47	242	270	171	91	55	26	8	6	5	11	3	50	195
W101	341-350	8	55	190	238	131	81	49	15	4	4	3	9	7	49	194
W101	351++	3745	1885	3497	4098	2837	1595	582	170	100	46	75	138	61	584	3155
RATE_SCH	USAGE_BLOCK															
W111/112	001-100	485	72	31	40	37	44	54	188	665	1008	1090	848	460	105	41
W111/112	101-200	333	86	15	7	29	25	55	184	335	329	297	330	344	98	21
W111/112	201-300	380	205	35	40	55	90	169	311	348	315	285	294	382	211	46
W111/112	301-400	285	239	85	71	108	142	218	308	252	237	224	244	306	266	92
W111/112	401-500	240	224	90	99	142	170	239	282	217	170	170	199	252	246	137
W111/112	501-600	176	206	115	90	139	139	228	227	140	137	149	137	168	237	108
W111/112	601-700	122	165	109	88	134	189	214	158	158	104	94	132	140	175	107
W111/112	701-800	108	157	110	108	162	166	190	127	93	54	69	93	109	147	120
W111/112	801-900	75	145	118	92	128	179	140	104	71	66	43	53	83	148	116
W111/112	901-1000	77	115	133	92	132	136	146	114	51	45	40	53	47	133	121
W111/112	1001-1100	43	120	99	114	151	117	114	73	49	33	33	40	46	102	123
W111/112	1101-1200	26	108	107	94	139	105	107	65	40	36	37	28	46	93	101
W111/112	1201-1300	29	67	116	87	108	103	73	56	35	18	25	27	34	68	116
W111/112	1301-1400	30	82	94	83	89	80	60	52	28	28	19	36	33	58	99

Staff Response to Cascade DR 7

Attachment B

Avista Staff-136 Natural Gas																	
W111/112	1401-1500	34	37	92	78	90	87	58	35	26	14	18	17	28	63	99	
W111/112	1501-1600	17	60	89	72	82	79	42	38	18	16	23	24	19	42	80	
W111/112	1601-1700	25	55	86	77	80	66	47	33	14	22	11	13	26	33	66	
W111/112	1701-1800	19	35	73	60	66	48	44	16	16	11	9	13	18	43	62	
W111/112	1801-1900	17	33	61	54	67	45	33	26	21	7	9	18	25	34	67	
W111/112	1901-2000	13	31	52	61	42	43	42	30	7	8	9	12	13	33	54	
W111/112	2001-2100	16	31	64	52	65	55	29	16	11	10	9	7	10	28	54	
W111/112	2101-2200	16	25	47	60	58	51	28	21	12	7	10	5	13	14	68	
W111/112	2201-2300	8	21	60	47	47	37	16	27	11	8	7	8	10	21	51	
W111/112	2301-2400	9	15	34	49	39	25	16	24	11	4	9	9	11	12	32	
W111/112	2401-2500	8	17	52	40	37	25	16	26	15	2	6	13	8	17	43	
W111/112	2501-2600	6	16	40	48	46	30	20	15	5	7	2	4	7	20	34	
W111/112	2601-2700	15	21	41	38	37	34	17	12	3	0	6	10	5	12	40	
W111/112	2701-2800	4	14	34	42	33	16	12	10	8	5	2	6	6	12	28	
W111/112	2801-2900	6	16	33	33	25	17	21	8	5	1	3	5	13	9	33	
W111/112	2901-3000	8	20	25	42	33	24	14	9	1	1	3	4	5	12	28	
W111/112	3001-3100	6	14	23	19	22	19	11	11	4	4	1	4	8	14	25	
W111/112	3101-3200	2	12	27	20	19	12	15	7	4	1	2	4	4	16	23	
W111/112	3201-3300	2	14	24	18	27	16	13	2	2	0	0	2	1	15	32	
W111/112	3301-3400	4	11	20	21	16	16	14	11	0	1	2	1	2	4	18	
W111/112	3401-3500	1	8	13	24	20	10	8	7	3	3	2	2	2	11	18	
W111/112	3501++	71	227	494	510	495	329	226	120	56	45	44	54	73	172	439	

RATE_SCH	USAGE_BLOCK	OCT_2014	NOV_2014	DEC_2014	JAN_2015	FEB_2015	MAR_2015	APR_2015	MAY_2015	JUN_2015	JUL_2015	AUG_2015	SEP_2015	OCT_2015	NOV_2015	DEC_2015
W121/122	0-5000	3	2	0	0	0	1	1	3	4	4	2	1	2	2	0
W121/122	5001-10000	9	7	6	4	6	6	7	7	11	14	15	13	11	6	4
W121/122	10001-15000	8	7	4	4	8	11	11	11	8	6	6	9	11	7	4
W121/122	15001-20000	5	7	10	7	7	2	2	1	1	0	1	1	0	7	9
W121/122	20001-25000	0	0	3	4	3	2	3	1	0	2	1	1	0	1	4
W121/122	25001-30000	3	2	1	1	2	1	2	1	2	0	1	1	2	0	0
W121/122	30001-35000	1	1	1	1	0	1	0	1	0	1	1	0	1	2	1
W121/122	35001-40000	0	0	0	0	0	0	2	1	1	0	0	1	0	0	0
W121/122	40001-45000	0	0	0	0	0	1	1	1	0	0	0	0	0	0	0
W121/122	45001-50000	0	0	1	0	2	1	0	0	0	0	0	0	0	0	0
W121/122	50001-55000	0	0	1	2	1	0	0	0	0	0	0	0	0	0	2
W121/122	55001-60000	0	1	1	0	0	1	0	0	0	0	0	0	0	0	0
W121/122	60001++	0	0	1	2	1	0	0	0	0	0	0	0	0	1	1

RATE_SCH	USAGE_BLOCK	OCT_2014	NOV_2014	DEC_2014	JAN_2015	FEB_2015	MAR_2015	APR_2015	MAY_2015	JUN_2015	JUL_2015	AUG_2015	SEP_2015	OCT_2015	NOV_2015	DEC_2015
W146	001-25000	0	20	18	9	7	6	6	7	16	17	20	20	13	9	5
W146	25001-50000	0	35	14	11	10	17	20	22	13	14	9	11	18	20	21
W146	50001-75000	0	8	2	10	11	7	4	1	3	2	3	3	2	2	4
W146	75001-100000	0	4	1	3	1	2	2	2	0	0	0	0	0	2	3
W146	100001-125000	1	1	2	1	2	0	0	0	1	2	2	2	2	1	1
W146	125001-150000	0	1	0	1	1	0	0	1	3	1	2	2	1	0	0
W146	150001-175000	0	1	1	0	0	1	0	0	1	1	0	0	1	3	1
W146	175001-200000	0	2	1	0	1	1	2	1	0	0	0	0	0	0	0
W146	200001-225000	0	0	0	1	0	0	0	2	0	0	0	0	0	0	0
W146	225001-250000	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
W146	250001-275000	0	0	0	0	1	1	1	0	0	0	0	0	0	0	0
W146	275001-300000	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
W146	300001++	0	4	1	3	3	2	1	1	1	1	1	1	1	1	2

ATTACHMENT B
to Avista's Response to Staff DR No. 136 is being
provided electronically only.