

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)
Cascade Natural Gas Corporation) Docket No. UG-190714
For an Order Authorizing Approval of an Extension to) PETITION OF CASCADE
File its Natural Gas Integrated Resource Plan) NATURAL GAS CORPORATION

I. INTRODUCTION

Cascade Natural Gas Corporation (“Cascade” or "Company"), at 8113 W Grandridge Blvd, Kennewick, Washington, respectfully petitions the Washington Utilities and Transportation Commission (Commission) to issue an order authorizing an extension from December 14, 2020 to February 26, 2021 to submit the Company's Natural Gas Integrated Resource Plan (IRP).

UG-190714 Service List:

Sally Brown
WUTC
PO Box 47250
Olympia, WA 98504
sally.brown@utc.wa.gov

Michael Parvinen
Manager, Regulatory
Cascade Natural Gas
Corporation
8113 W Grandridge Blvd
Kennewick, WA 99336-7166
michael.parvinen@cngc.com

Lisa Gafken
Office of the Attorney
General
800 Fifth Avenue STE 2000
Seattle, WA 98104-3188
Lisa.Gafken@atg.wa.gov

2 Please direct all correspondence related to this Petition as follows:

Mark Sellers-Vaughn
Manager, Supply Resource Planning
Cascade Natural Gas Corporation
8113 W Grandridge Blvd
Kennewick, WA 99336
Telephone: (509) 734-4589
E-mail: mark.sellers-vaughn@cngc.com

Brian Robertson
Supervisor, Resource Planning
Cascade Natural Gas Corporation
8113 W Grandridge Blvd
Kennewick, WA 99336
Telephone: (509) 734-4546
E-mail: brian.robertson@cngc.com

II. BACKGROUND

3 The Company submits the IRP to the Commission every two years as outlined in WAC
480-90-238. Cascade's next IRP is due to be filed with the Commission on or before
December 14, 2020. The IRP is a methodology for identifying and evaluating various resource
options and is a process by which to establish a plan of action for resource decisions. Cascade
uses SENDOUT® (a PC based programming model widely used to solve natural gas supply
and transportation optimization questions) for peak day demand, resource valuation and for
conducting Monte Carlo style risk analyses. SENDOUT® modeling results are used to select
the Cascade's Preferred Portfolio.

4 Cascade uses a public process to solicit technical expertise and feedback throughout the
development of the IRP through a series of Technical Advisory Group (TAG) meetings.

5 For the reasons stated herein, Cascade respectively requests a 74-day extension from
December 14, 2020 to February 26, 2021 to submit the Company's Natural Gas IRP to provide
enough time for the conclusion of various state legislative sessions so that Cascade can
integrate any changed regulations that may impact its IRP modeling and assumptions.

III. SUPPORT FOR EXTENSION

6 There are currently numerous legislative proposals in the States of Washington and Oregon
that will have major impacts on natural gas planning, including Washington's Senate Clean
Energy Transformation Act (CETA) or Senate Bill 5116, Washington House Bills 1257 and
1444, and Oregon Senate Bill 98. Final rules and expectations for natural gas distribution
utilities with respect to each of these bills are expected to take several more months to create
and implement, which will affect the ability to fully realize the impacts to the Company's IRP
processes.

7 CETA requires 100% carbon free electricity serving Washington customers by 2045 and references renewable natural gas investments for distribution or consumption. Washington House Bills 1257 and 1444 call for new energy efficiency requirements with new requirements for buildings and appliance standards and will affect Cascade's conservation potential assessment (CPA) going forward, taking effect by 2022. A set of renewable natural gas and fuels bills, including Oregon SB 98, and Washington HB 1257, open up a path forward to acquire these supply side resources as a means to reduce carbon emissions.

8 With all of these legislative uncertainties, IRP modeling at this time would be premature. The impact of such legislation could fundamentally change the regional (and Cascade's) resource mix, and therefore have an impact on Cascade's customers. Thus, to the extent any of the potential legislation is enacted, new models would need to be run to account for the actual impact of such legislation. The Company feels the brief extension will allow Cascade to better consider the best resource mix needed to meet future customer needs.

IV. CONCLUSION

9 WHEREFORE, Cascade respectfully requests the Commission issue its Order approving a 74-day extension from December 14 to February 26, 2021 to submit the Company's Natural Gas Integrated Resource Plan as explained in this Petition.

DATED this 16th day of January 2020,



By: Mark Sellers-Vaughn
Manager, Supply Resource Planning