## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

COST MANAGEMENT SERVICES, INC.,

Complainant,

No. UG-061256

SUPPLEMENTAL DECLARATION OF JON T. STOLTZ

v.

CASCADE NATURAL GAS CORPORATION,

Respondent.

Jon T. Stoltz declares as follows:

1. I am Senior Vice President – Gas Supply and Regulatory for Cascade Natural Gas Corporation ("Cascade") and I make this supplemental declaration in opposition to Complainant Cost Management Services, Inc.'s motion for summary determination and in support of Cascade's motion for summary determination.

2. Cascade provides distribution system transportation service to Washington

non-core customers pursuant to Rate Schedule Nos. 663 and 664. Some of these customers

SUPPLEMENTAL DECLARATION OF JON T. STOLTZ – 1 Perkins Coie LLP 1120 N.W. Couch Street, Tenth Floor Portland, OR 97209-4128 Phone: 503.727.2000 Fax: 503.727.2222

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also purchase gas supply from Cascade. For customers that obtain both distribution system transportation service and gas supply from Cascade, Cascade provides the distribution system transportation service under service agreements that are entirely separate from, and do not depend upon, Cascade's contracts to sell gas to those same customers. If a customer purchases both distribution system transportation and gas supply from Cascade, it does so pursuant to two separate contracts. Cascade does not offer price concessions on its regulated transportation service to customers that also purchase gas supply from Cascade.

3. Cascade's purchase of gas supply for its sales of unbundled gas to non-core customers is made entirely separately from its purchase of gas supply for sales to core customers and does not interfere in any way with meeting Cascade's obligations to core customers. Cascade's unbundled gas sales program is operated entirely separately from its purchase of gas to meet the needs of its core customers. Cascade strives to comply with its least-cost planning obligations to the best of its ability. In my opinion, Cascade's efforts to comply with its least-cost planning obligations and its obligations with respect to purchasing gas supply to meet its core customers' needs are not affected by its unbundled gas sales activity.

4. Cascade documents the revenues and expenses that pertain to its unbundled gas sales and the Commission is equally able to audit these records as if Cascade had conducted the operations through a separate entity. In its current rate case, Cascade produced records relating to these revenues and expenses and is unaware of any problem that Commission Staff or any other party had in accessing or understanding these records.

5. Cascade produced copies of its current contracts for gas supply in response to a data request of Commission Staff in Cascade's current rate case, including Exhibit 23 to the Stipulated Facts, on July 11, 2006.

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6. When Cascade sells gas to a customer who receives distribution service from another gas company, such as Avista or Puget Sound Energy, the other gas company must be informed that Cascade will be delivering gas to that utility's distribution system and the customer for that gas supply must be identified. This notice typically is provided by the customer. Attached as Exhibit 1 to this Supplemental Declaration is a true and correct copy of such a notice sent by the Defense Logistics Agency to Puget Sound Energy that relates to the contract that is Exhibit 23 to the Stipulated Facts.

I CERTIFY UNDER PENALTY OF PERJURY under the laws of the State of Washington that the foregoing is true and correct.

DATED at Seattle, Washington, this <u>30<sup>th</sup></u> day of November, 2006.

bltz Jon

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#### DEFENSE LOGISTICS AGENCY DEFENSE ENERGY SUPPORT CENTER INSTALLATION ENERGY – AWR 8725 JOHN J. KINGMAN ROAD, SUITE 4950 FORT BELVOIR, VIRGINIA 22060-6222

June 29, 2005

Puget Sound Energy BOT-01H P.O. Box 91269 Bellevue, WA 98009-9269

This is to confirm in writing that Cascade Natural Gas Corporation has been chosen to act as agent on behalf of McChord AFB, and NAS Everett, effective with the October 1, 2005, flow and continuing until further written notice. Cascade Natural Gas Corporation will be nominating, allocating, and balancing the usage. Please send all future correspondence to the following addresses:

Cascade Natural Gas Corporation 222 Fairview Avenue Seattle, WA 98109 Dennis Gates 206-381-6835

Defense Energy Support Center 8725 John J. Kingman Road Suite 3830 Ft. Belvoir, VA 22060-6222 Mary Grace Berry-Chambers 703-767-8580

Sincerely,

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Mary Grace Berry-Chambers, Energy Manager Installation Energy DESC-AWR Marygrace.chambers@dla.mil

> Supp. Stoltz Decl. Exh. No. 1 Page 1 of 1

#### CERTIFICATE OF SERVICE

I hereby certify that I have this day served this **SUPPLEMENTAL** 

### DECLARATION OF JON T. STOLTZ IN SUPPORT OF CASCADE'S MOTION

#### FOR SUMMARY DETERMINATION upon all parties of record in this proceeding by

causing a copy to be sent by electronic mail and by first class mail, postage prepaid to:

John Cameron Ryan Flynn Davis Wright Tremaine LLP Suite 2300 1300 SW Fifth Avenue Portland, OR 97201

Edward A. Finklea Chad M. Stokes Cable Huston Benedict Haagensen & Lloyd LLP Suite 2000 1001 SW Fifth Avenue Portland, OR 97204

Greg Trautman Assistant Attorney General 1400 S. Evergreen Park Dr. SW P.O. Box 40128 Olympia, WA 98504 Doug Betzold Cost Management Services, Inc. 2737 - 78<sup>th</sup> Avenue SE, Suite 101 Mercer Island, WA 98040

Judy Krebs Public Counsel Section Office of Attorney General Suite 2000 800 Fifth Avenue Seattle, WA 98104

Ann Rendahl Kippi Walker Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, WA 98504-7250

Dated this 1st day of December, 2006.

PERKINS COIE LLP By

James M. Van Nostrand, WSBA #15897 Lawrence H. Reichman, OSB #86083

Attorneys for Cascade Natural Gas Corporation

CERTIFICATE OF SERVICE – 1

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