

CASCADE NATURAL GAS CORPORATION GENERAL RATE CASE
Docket No. UG-19_____

ATTACHMENT F: RATE CASE COMPLIANCE MATRIX

March 29, 2019

Cascade Natural Gas
Attachment F: Rate Case Compliance Matrix

Citation	Requirement	Compliance
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WAC 480-07-510 - General rate proceedings		
Introductory	<p>General rate proceeding filings by electric, natural gas, pipeline, and Class A telecommunications companies as defined in <u>WAC 480-120-034</u> must include the information described in this section. The company and all parties to an adjudication in a general rate proceeding must file all required documents in electronic form consistent with the requirements in <u>WAC 480-07-140</u> and by the next business day must file five paper copies of all testimony and exhibits unless the commission establishes a different number. If an exhibit is a database, spreadsheet, or model, the paper copy of that exhibit may simply reference or describe its contents if printing the entirety of the database, spreadsheet, or model would result in a document exceeding five pages and would render the data, spreadsheet cells, or model unusable. The party, however, must submit a complete electronic version of the database, spreadsheet, or model, with all information, formulae, and functionality intact, as part of the party's electronic filing.</p>	<p>The Company's March 29, 2019 filing contains all the required documents in electronic form consistent with the requirements in <u>WAC 480-07-140</u>.</p> <p>The Company will file by the next business day five paper copies, plus an original, of all testimony and exhibits.</p> <p>In some instances where exhibits or attachment prove too voluminous (exceeding five pages) a reference or description of the file is provided. The Company does however submit all complete electronic versions of all documents as part of the filing.</p>
(1) Testimony and exhibits	<p>The company's initial filing and any supplemental filings the commission authorizes must include all testimony and exhibits the company intends to present as its direct case. The company must serve a copy of the initial filing on the public counsel unit of the Washington state attorney general's office at the time the company makes the filing with the commission if the proceeding is the type in which public counsel generally appears or has appeared in the past.</p>	<p>The Company's March 29, 2019 filing complies with the rule, as all testimony and exhibits the company intends to present as its direct case are provided.</p> <p>One complete copy of all documentation has also been served on the Public Counsel unit of the Washington state attorney general's office.</p>

**Cascade Natural Gas
Attachment F: Rate Case Compliance Matrix**

Citation	Requirement	Compliance
	The filing must include a results-of-operations statement showing test year actual results and any restating and pro forma adjustments in columnar format that support the company's general rate request.	A results of Operations Summary sheet with adjustments is provided in Exh MCP-2 "ROO Summary Sheet". Exh MCP-5 "Summary of Adj" contains restating and Pro Forma adjustment summaries in columnar format.
	The company must identify each restating and pro forma adjustment and the effect of that adjustment on the company's operations and revenue requirement. The testimony must include a written description of each proposed restating and pro forma adjustment describing the reason, theory, and calculation of the adjustment.	<p>Exh MCP-5 "Summary of Adj" contains restating and Pro Forma adjustment summaries in columnar format.</p> <p>Restating adjustments R-1, R-3 & R-4 are described in Exh IDM-3 and in Exh IDM-1T in the "Revenue Adjustments" section.</p> <p>Restating adjustments R-2, R-5 & R-6 and Pro Forma Adjustments, P-1, P-2, P-3 and P-4 are presented in Exh MCP-5 "Summary of Adj" with narrative descriptions in Exh MCP-1T in the "Revenue Requirement and Rate Request Proposal" section.</p>
(2) Tariff sheets	The company's initial filing must include the company's proposed new or revised tariff sheets in legislative format (i.e., with strike-through to indicate the material to be deleted or replaced and underlining to indicate the material to be inserted) consistent with the requirements in <u>WAC 480-80-105</u> , as well as copies of any tariff sheets that are referenced in the new or amended tariff sheets.	The filing includes proposed revised tariffs as Attachment A to the cover letter. Legislative tariffs where the changes to the tariff sheets are in redline/strike-out text is included in the filing as Attachment B. The proposed tariffs are also discussed in Pamela J. Archer's Direct Testimony, PJA-1T.
(3) Detailed support for proposals	(a) General. The company must include in its initial testimony and exhibits, including those addressing accounting adjustments, sufficient detail, calculations, information, and descriptions necessary to meet its burden of proof. Any party responding to the company's proposal also must include in that party's testimony and exhibits sufficient detail, calculations, information, and descriptions necessary to support its filed case.	The Company's March 29, 2019 filing provides detailed support for all testimony and exhibits.
	(b) Capital structure and rate of return. The company must include in testimony and exhibits a detailed	Testimony regarding the Company's Capital structure Rate of Return is provided in witness Tammy J. Nygard's Direct

**Cascade Natural Gas
Attachment F: Rate Case Compliance Matrix**

Citation	Requirement	Compliance
	description of the development of any capital structure and rate of return proposals. Any other party that files testimony or exhibits that propose revisions to the company's current capital structure or authorized rate of return also must provide similar detailed information in testimony and exhibits supporting its proposal.	Testimony Exh TJN-1T)and Exhibits. Discussion of the Company's Return on Equity is addressed in the direct testimony of Ann Bulkley.
	(c) Restating and pro forma adjustments. Each party that proposes restating or pro forma adjustments must include in its testimony and exhibits a detailed portrayal of the restating and pro forma adjustments the party uses to support its proposal or position. That portrayal must specify all relevant assumptions and include specific references to charts of accounts, financial reports, studies, and all similar records on which the party relies. Testimony and exhibits must include support for, and calculations showing, the derivation of each input number used in the detailed portrayal, as well as the derivation of all interstate and multiservice allocation factors.	<p>Maryalice Peters' exhibit, Exh MCP-5 "Summary of Adj" contains Restating and Pro Forma adjustment summaries in columnar format.</p> <p>Restating adjustments R-1, R-3 & R-4 are described in Isaac Myhrum's exhibit, Exh IDM-3 and in direct testimony Exh IDM-1T in the "Revenue Adjustments" section.</p> <p>Restating adjustments R-2, R-5 & R-6 and Pro Forma Adjustments, P-1, P-2, P-3 and P-4 are presented in Exh MCP-5 "Summary of Adj" with narrative descriptions in Exh MCP-1T in the "Revenue Requirement and Rate Request Proposal" section.</p> <p>Company exhibits and workpapers show support and derivation of input numbers. Workpaper MCP WP 1.6 shows derivation of allocation factors.</p>
	(i) Restating adjustments adjust the booked operating results for any defects or infirmities in actual recorded results of operations that can distort test period earnings. Restating adjustments are also used to adjust from an as-recorded basis to a basis that the commission accepts for determining rates. Restating adjustments must be calculated based on the unadjusted test year operating results, not on another party's adjustments. The commission may refuse to consider any adjustment that is not calculated consistent with this requirement.	The Company's restating adjustments are calculated based on the unadjusted test year operating results and adjust to a modified historical test year basis that the commission accepts for determining rates.

**Cascade Natural Gas
Attachment F: Rate Case Compliance Matrix**

Citation	Requirement	Compliance
	<p>Nonexclusive examples of restating adjustments are adjustments that: (A) Remove prior period amounts; (B) Eliminate below-the-line items that were recorded as operating expenses in error; (C) Adjust from book estimates to actual amounts; (D) Annualize ongoing costs that the company began to incur part way through the test year; (E) Normalize weather or hydro conditions; or (F) Eliminate or normalize extraordinary items recorded during the test period.</p>	
	<p>(ii) Pro forma adjustments give effect for the test period to all known and measurable changes that are not offset by other factors. The company and any other party filing testimony and exhibits proposing pro forma adjustments must identify dollar values and underlying reasons for each proposed pro forma adjustment. Pro forma adjustments must be calculated based on the restated operating results. Pro forma fixed and variable power costs, net of power sales, may be calculated directly based either on test year normalized demand and energy load, or on the future rate year demand and energy load factored back to test year loads.</p>	<p>The Company's proforma adjustments identify dollar values and underlying reasons for each proposed pro forma adjustments. The pro forma adjustments are calculated based on the restated operating results.</p>
	<p>(iii) If a party proposes to calculate an adjustment in a manner different than the method the commission most recently accepted or authorized for the company, the party must also include in testimony and exhibits the rationale for, and documents that demonstrate, how that adjustment would be calculated under the methodology previously accepted by the commission and must explain the reason for the proposed change. Commission approval of a settlement does not constitute commission acceptance of any underlying methodology unless the commission so states in the order approving the settlement.</p>	<p>The Company does not propose to calculate an adjustment in a manner different than the method the Commission most recently accepted or authorized for the Company.</p>

**Cascade Natural Gas
Attachment F: Rate Case Compliance Matrix**

Citation	Requirement	Compliance
	(d) Revenue sources. The company must include in testimony and exhibits a detailed portrayal of revenue from regulated sources, by source, during the test year and the changes that would result in those revenues if the commission approves the company's request, including an explanation of how the resulting changes were derived.	A detailed portrayal of Company revenues and revenue changes that would result from Commission's approval of the Company's request is presented in Exh IDM-2 "Summary of Revenues by Rate Schedule".
	(e) Achievement of rate of return. The company must demonstrate in testimony and exhibits why the company has not achieved its authorized rate of return and what actions the company has taken prior to and during the test year to improve its earnings in addition to its request for increased rates. If the company has not taken any such actions, the company must explain why it has not.	The Company demonstrates and explains why it has not achieved its authorized rate of return in Maryalice C. Peters' Direct Testimony, MCP-1T. Supporting evidence is presented in Exhibit No. __ (MCP-2).
	(f) Rate base and results of operations. The company's testimony and exhibits must include a representation of the company's actual rate base and results of operations during the test period, calculated in the same manner the commission used to calculate the revenue requirement in the final order in the company's most recent general rate proceeding.	<p>A summary representation of the Company's actual rate base during the test period is presented in Maryalice Peters' exhibit, Exh No. __ (MCP-2). Additional rate base detail is provide in workpapers MCP WP-1.2, "Rate Base"and MCP WP-1.3, "Plant in Service & Accumulated Depreciation".</p> <p>A representation of the Company's results of operations during the test period is also presented in summary form in Exh No. __ (MCP-2). Additional results of operations detail is provide in workpapers MCP WP-1.1, "Operating Report".</p>
	(g) Affiliate and subsidiary transactions. The company's testimony and exhibits must supplement, as necessary, the annual affiliate and subsidiary transaction reports required in rules governing reporting for the applicable industry to include all such transactions during the test period. The company must identify all affiliate and subsidiary transactions that materially affect the proposed rates. The company must support the	<p>The Company's attachment to this filing, "Attachment I – Affiliated Interest" contains an updated annual affiliate and subsidiary transaction report as well as related transactions.</p> <p>The Company supports the allocation method used to allocate common costs between regulated and nonregulated affiliated entities and the dollar amount of those costs in "Attachment I</p>

**Cascade Natural Gas
Attachment F: Rate Case Compliance Matrix**

Citation	Requirement	Compliance
	allocation method the company used to distribute common costs between regulated and nonregulated affiliated entities and the dollar amount of those costs.	– Affiliated Interest” in the file “ CNG Cost Allocation Manual 2017.pdf”
	(h) Electronic documents and confidentiality. Electronic files must be fully functional and include all formulas and linked spreadsheet files. Electronic files that support exhibits must use logical file paths, as necessary, by witness and must use identifying file names consistent with the naming requirements in WAC 480-07-140. A party may file a document with locked, hidden, or password protected cells only if such restricted access is necessary to protect the information within the cells that is not subject to public disclosure. The party must identify each locked, hidden, or password protected cell and must designate such cells, as well as any other information the party contends is confidential under RCW 80.04.095 or otherwise protected from public disclosure, in compliance with the requirements in WAC 480-07-160 and any applicable protective order. The party must make such information accessible to all persons who have signed the protective order or are otherwise entitled to access the information including, but not necessarily limited to, commission staff and public counsel. Redacted versions of models or spreadsheets that contain information that is designated as confidential or highly confidential or otherwise protected from public disclosure must be in .pdf format (using Adobe Acrobat or comparable software) and must mask the information protected from public disclosure as required in WAC 480-07-160.	The Company’s March 29, 2019 filing contains electronic files that comply with this rule, including the rules regarding accessibility and confidentiality.
	(i) Referenced documents. If a party's testimony or exhibits refer to a document including, but not limited to, a report, study, analysis, survey, article, or court or	See below.

Cascade Natural Gas
Attachment F: Rate Case Compliance Matrix

Citation	Requirement	Compliance
	agency decision, the party's testimony and exhibits must include that document except as provided below:	
	(i) A party may include an official citation or internet Uniform Resource Locator (URL) to a commission order or to a court opinion or other state or federal agency decision, rather than the document itself, if that decision is reported in a generally accepted publication (e.g., Washington Reports Second (Wn.2d), Public Utility Reports (P.U.R.), etc.) or if the document is readily available on the web site of the agency that entered that decision;	The Company's March 29, 2019 filing contains documents with official citations to a commission order or to a court opinion or other state or federal agency decision in a generally accepted publication, as necessary.
	(ii) A party may include only the relevant excerpts of a voluminous document if the party also provides a publicly accessible internet URL to the entire document or describes the omitted portions of the document and their content and makes those portions available to the other parties and the commission upon request; and	The Company's testimony and exhibits comply with the rule in which relevant excerpts of voluminous documents are present.
	(iii) A party is not required to file or distribute materials subject to third-party copyright protection but must describe those materials and their content and make them available for inspection upon request by the parties and the commission.	The Company's testimony and exhibits comply with the rule in which materials subject to third-party copyright protection are present.
(4) Work papers	(a) General. Work papers are documents that support the technical aspects of a party's testimony and exhibits. Work papers may include, but are not limited to, calculations, data analysis and raw data. Work papers are not a part of a party's direct case. Within five business days after each party files and serves its testimony and exhibits, the party also must provide to all other parties the work papers on which each of its witnesses relied when preparing testimony and exhibits. All work papers must comply with the requirements of this subsection.	The Company's March 29, 2019 filing contains work papers that support the technical aspects of a party's testimony and exhibits. Within five business days after The Company serves its testimony and exhibits, it shall provide to all other parties the work papers on which each of its witnesses relied when preparing testimony and exhibits. All of the Company's work papers comply with the requirements of this subsection.

**Cascade Natural Gas
Attachment F: Rate Case Compliance Matrix**

Citation	Requirement	Compliance
	(b) Organization. Work papers must be plainly identified and well organized, with different documents or sections separated by or into tabs, and must include an index. All work papers must be cross-referenced and include a description of the cross-referencing methodology.	The Company’s March 29, 2019 filing contains work papers that comply with the rule. Workpapers are well organized and indexed and include descriptions of workpaper tiles with cross referencing methodology listed in index tables.
	(c) Any work papers provided to other parties must comply with requirements governing electronic documents and confidentiality in subsection (3)(h) and referenced documents in subsection (3)(i) of this section.	The Company’s March 29, 2019 filing contains work papers that comply with the rule.
	(d) Filing designated work papers with the commission. If the commission determines that it needs information in addition to a party's testimony and exhibits, the commission may issue a bench request for designated portions of that party's work papers. The commission will receive into evidence the work papers a party provides in response to a bench request unless the commission rejects that response, either in response to an objection or on the commission's own motion, as provided in WAC 480-07-405 (7)(b). The commission will not rely on any other work papers as the basis for any finding of fact or conclusion of law in the proceeding unless the commission formally admits such work papers into the evidentiary record.	The Company’s acknowledges the rule regarding work papers and bench requests.
(5) Summary document	(a) Contents. The company must include in its initial filing a document that summarizes the information in this subsection (5)(a) on an annualized basis, if applicable, and must itemize revenues from any temporary, interim, periodic, or other noncontinuing tariffs. The company must include in its rate change percentage and revenue change calculations any revenues from proposed general rate change tariffs that	Please see Attachment C, “CNGC Atch C GRC Summary 3.29.19”.

**Cascade Natural Gas
Attachment F: Rate Case Compliance Matrix**

Citation	Requirement	Compliance
	would supersede revenue from noncontinuing tariffs. The summary document must include:	
	(i) The date and amount of the last general rate change the commission authorized for the company and the revenue the company realized from that change during the test period based on the company's test period units of sale (e.g., kilowatt hours, therms, etc.);	Please see Attachment C, "CNGC Attch C GRC Summary 3.29.19".
	(ii) Total revenues the company is realizing at its present rates and the total revenues the company would realize at the requested rates;	Please see Attachment C, "CNGC Attch C GRC Summary 3.29.19".
	(iii) Requested revenue change in percentage, in total and by major customer class;	Please see Attachment C, "CNGC Attch C GRC Summary 3.29.19".
	(iv) Requested revenue change in dollars, in total and by major customer class;	Please see Attachment C, "CNGC Attch C GRC Summary 3.29.19".
	(v) The representative effect of the request in dollars for the average monthly use per customer, by customer class or other similar meaningful representation, including, but not limited to, the effect of the proposed rate change in dollars per month on residential customers by usage categories;	Please see Attachment C, "CNGC Attch C GRC Summary 3.29.19".
	(vi) Most current customer count, by major customer class;	Please see Attachment C, "CNGC Attch C GRC Summary 3.29.19".
	(vii) Current authorized overall rate of return and authorized rate of return on common equity;	Please see Attachment C, "CNGC Attch C GRC Summary 3.29.19".
	(viii) Actual rate of return and actual rate of return on common equity for the test period;	Please see Attachment C, "CNGC Attch C GRC Summary 3.29.19".
	(ix) Requested overall rate of return and requested rate of return on common equity, and the method or methods used to calculate the requested rates of return;	Please see Attachment C, "CNGC Attch C GRC Summary 3.29.19".
	(x) Requested capital structure;	Please see Attachment C, "CNGC Attch C GRC Summary 3.29.19".

**Cascade Natural Gas
Attachment F: Rate Case Compliance Matrix**

Citation	Requirement	Compliance
	(xi) Requested net operating income;	Please see Attachment C, "CNGC Attch C GRC Summary 3.29.19".
	(xii) Requested rate base and method of calculation, or equivalent; and	Please see Attachment C, "CNGC Attch C GRC Summary 3.29.19".
	(xiii) Revenue effect of any requested attrition allowance.	Please see Attachment C, "CNGC Attch C GRC Summary 3.29.19".
	(b) <i>Required service.</i>	
	(i) Persons to receive service. The company must serve the summary document on the persons designated below on the same date it files the summary document with the commission:	See below
	(A) The public counsel unit of the Washington state attorney general's office;	On March 29, 2019, the Company emailed the Company's Attachment C "Summary of Request Natural Gas Rate Increase" to the public counsel unit of the Washington state attorney general's office.
	(B) All intervenors on the commission's master service list for the company's most recent general rate proceeding;	On March 29, 2019, the Company emailed the Company's Attachment C "Summary of Request Natural Gas Rate Increase" to all intervenors on the commission's master service list for the company's most recent general rate proceeding.
	(C) All intervenors on the master service list for any other rate proceeding involving the company during the five years prior to the company's filing, if the company's rate change request may affect the rates established or considered in that prior proceeding; and	On March 29, 2019, the Company emailed the Company's Attachment C "Summary of Request Natural Gas Rate Increase" to all intervenors on the master service list for any other rate proceeding involving the company during the five years prior to the company's filing.
	(D) All persons who have informed the company in writing that they wish to be provided with the summary document required under this section.	On March 29, 2019, the Company emailed the Company's Attachment C "Summary of Request Natural Gas Rate Increase" to all other persons who have informed the company in writing that they wish to be provided with the summary document required under this section. Which was none.
	(ii) Cover letter. The company must enclose a cover letter with the summary document stating that the company's prefiled testimony and exhibits, and the	On March 29, 2019, the Company enclosed in the filing a cover letter stating that the company's prefiled testimony and exhibits, and the accompanying work papers, were available

**Cascade Natural Gas
Attachment F: Rate Case Compliance Matrix**

Citation	Requirement	Compliance
	<p>accompanying work papers, are available from the company on request, subject to any restrictions on information that is protected from public disclosure, if the company is not serving them along with the summary document.</p>	<p>from the company on request, subject to any restrictions on information that is protected from public disclosure.</p>
	<p>(iii) Limitation. This service requirement does not create a right to service or notice of future filings in the proceeding to the persons named to receive the summary. Any person other than commission staff and public counsel who wishes to be served documents subsequently filed in the general rate proceeding must petition to intervene in that proceeding.</p>	<p>The Company acknowledges the service requirement limitations listed in (iii).</p>
<p>(6) Cost studies</p>	<p>The company's initial filing must: (a) Include any cost studies the company performed or relied on to prepare its proposals;</p>	<p>No cost studies have been prepared by the Company for this proceeding. As ordered in Order 06 of UG-170929, Cascade agrees to a rate spread design based on an equal percent of margin increase (decrease) and will not use a cost study to support its proposed changes to rate.</p>
	<p>(b) identify all cost studies conducted in the last five years for any of the company's services; and</p>	<p>Cost of Service Studies were presented in the Company's last two general rate case proceedings: UG-170929 and UG-152286.</p>
	<p>and (c) describe the methodology the company used in all such cost studies. If the cost studies are in the form of a model, the company must provide a copy of, or reasonable access to, the model that will enable the commission to verify and modify the model's inputs and assumptions.</p>	<p>No cost studies have been prepared by the Company for this proceeding.</p>

Cascade Natural Gas
Attachment F: Rate Case Compliance Matrix

Citation	Requirement	Compliance
(7) Additional documents	<p>The company's initial filing must include the following documents or an internet URL for each of these documents:</p> <p>(a) The company's most recent annual report to shareholders, if any, and any subsequent quarterly reports to shareholders;</p>	<p>Please see Attachment G, "CNGC Attch G, Additional Documents, 3.29.19.docx" for URL links to: The company's most recent annual report to shareholders, if any, and any subsequent quarterly reports to shareholders.</p>
	<p>(b) The company's most recent FERC Form 1 and FERC Form 2 for electric and natural gas companies; and</p>	<p>Please see Attachment G, "CNGC Attch G, Additional Documents, 3.29.19.docx" for URL links.</p>
	<p>(c) The company's Form 10K's, Form 10Q's, any prospectuses for any issuances of securities, and quarterly reports to stockholders, if any, for the most recent two years prior to the rate change request.</p>	<p>Please see Attachment G, "CNGC Attch G, Additional Documents, 3.29.19.docx" for URL links.</p>