

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

TREE TOP, INC., a Washington Corporation)	DOCKET UG-210745
)	
Complainant,)	
)	
v.)	
)	
CASCADE NATURAL GAS CORPORATION, a Washington Corporation)	
)	
Respondent.)	

EXH. BGM-4R

Cascade Responses to Tree Top Data Requests

DIRECT TESTIMONY OF BRADLEY G. MULLINS

ON BEHALF OF

TREE TOP, INC.

April 8, 2022

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s First Set of Data Requests

Request No. 1

Date submitted: March 14, 2022
Preparer: Chris Robbins
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 734-4593

TREE TOP REQUEST NO. 1 TO CASCADE:

For each of Cascade's Washington transportation service customers, including customers on Schedule 663 and special contract customers on Schedules 901 through 914, please state the customer's daily usage from February 1, 2021 through February 28, 2021. For the Schedule 663 customers other than Tree Top, please obfuscate the customer names by assigning a unique customer identifier to each customer. E.g., "Customer 1," "Customer 2." In addition, please also specifically identify which customer is Tree-Top.

RESPONSE TO REQUEST NO. 1:

Please see attached spreadsheet "Tree Top DR 1-3 Attachment.xlsx" for all Schedule 663 and 900-914 daily customer usage from February 1, 2021 through February 28, 2021. The usage data is provided in column F, labeled "Usage."

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s First Set of Data Requests

Request No. 2

Date submitted: March 14, 2022
Preparer: Chris Robbins
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 734-4593

TREE TOP REQUEST NO. 2 TO CASCADE:

For each of Cascade's Washington transportation service customers, including customers on schedule 663 and special contract customers on Schedules 901 through 914, please state the customer's daily nominations from February 1, 2021 through February 28, 2021. Please obfuscate the customer names using the same customer identifiers described in Tree Top Data Request 1.

RESPONSE TO REQUEST NO. 2:

Please see attached spreadsheet "Tree Top DR 1-3 Attachment.xlsx" for the daily nominations from February 1, 2021 through February 28, 2021 for all Schedule 663 and 900-914 customers. The daily nominations are provided in column E, labeled "Scheduled."

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s First Set of Data Requests

Request No. 3

Date submitted: March 14, 2022
Preparer: Chris Robbins
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 734-4593

TREE TOP REQUEST NO. 3 TO CASCADE:

For each of Cascade's Washington transportation service customers, including customers on schedule 663 and special contract customers on Schedules 901 through 914, please state the customer's marketer as of February 28, 2021. Please obfuscate the customer names using the same customer identifiers described in Tree Top Data Request 1.

RESPONSE TO REQUEST NO. 3:

Please see attached spreadsheet "Tree Top DR 1-3 Attachment.xlsx," which includes each Schedule 663 and 900-914 customer's marketer. The marketers are provided in column G, labeled "Marketer."

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s First Set of Data Requests

Request No. 4

Date submitted: March 14, 2022
Preparer: Chris Robbins
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 734-4593

TREE TOP REQUEST NO. 4 TO CASCADE:

Please provide Cascade's ledger of daily gas purchase and sales transactions with deliveries over the period February 1, 2021 through February 28, 2021. For each transaction, please provide all fields stored in Cascades energy information system, including, but not limited to, the counterparty, buy/sell, the delivery start and end date, the date the transaction was executed, volume of gas transacted, the price of the gas transacted, the market hub where the gas was transacted, the point of receipt/delivery, and any other information stored in Cascade's information system.

RESPONSE TO REQUEST NO. 4:

Cascade did not have any daily gas purchase and sales transactions with deliveries over the period February 1, 2021 through February 28, 2021.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s First Set of Data Requests

Request No. 5

Date submitted: March 14, 2022
Preparer: Chris Robbins
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 734-4593

TREE TOP REQUEST NO. 5 TO CASCADE:

Please provide Cascade's ledger of all natural gas purchase and sales contracts, other than daily transactions, including derivative contracts (e.g. swaps), with settlement in February 2021. For each transaction, please provide all fields stored in Cascades energy information system, including, but not limited to, the counterparty, buy/sell, the delivery start and end date, the date the transaction was executed, volume of gas transacted, the price of the gas transacted, the market hub where the gas was transacted, the point of receipt/delivery, and any other information stored in Cascade's information system.

RESPONSE TO REQUEST NO. 5:

Cascade objects to Tree Top's request to provide "all fields stored in Cascade's energy information system" because this request is not reasonably targeted to produce information relevant to Tree Top's complaint, and because Cascade's energy information system includes over 200 fields for each gas nomination, and as a result would be unduly burdensome for Cascade to produce. Additionally, Cascade objects to Tree Top's request to identify the counter party for each transaction, as this information is competitively sensitive, irrelevant to the scope of this proceeding, and not reasonably calculated to lead to discoverable information. Cascade proposes to instead provide the specific information included in the request (counter party identified by number), buy/sell, the delivery start and end date, the date the transaction was executed, volume of gas transacted, the price of the gas transacted, the market hub where the gas was transacted, the point of receipt/delivery, and has conferred with counsel for Tree Top and understands that Tree Top is comfortable with Cascade's proposal.

Without waiving these objections, please see attached spreadsheet "Tree Top DR 5a (C).xlsx" for Cascade's ledger of all natural gas purchase and sales contracts, other than daily transactions, including derivative contracts, with settlement in February 2021. In column A, the counterparty for each transaction is designated with a number instead of by name. Column B indicates whether the transaction was a purchase ("BUY") or sale ("SELL"). The delivery start and end date are shown in columns E and F, respectively. The date the transaction was executed is

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shown in column O. The volume of gas transacted is shown in columns J and K. The price of the gas transacted is shown in columns M and N and the market hub where the gas was transacted is shown in column C. Cascade is providing spreadsheet “Tree Top DR 5a (C).xlsx” as a confidential document subject to the Protective Order in this proceeding.¹

Please also see attached spreadsheet “Tree Top DR 5b - NW Pipeline (C).xlsx” for Cascade’s ledger of daily receipt/delivery locations for gas received into Cascade’s upstream provider Northwest Pipeline’s system and delivered to Cascade’s natural gas system in February 2021. Column A indicates the delivery dates and Column B identifies the purchase location. Columns C and G, respectively, indicate the receipt and delivery locations on Cascade’s system; these locations are identical due to the nature of Cascade’s Asset Management Agreement, and both indicate the point on Cascade’s system at which the gas was received/delivered. Column D identifies Cascade as the purchaser of the gas and Column H identifies Cascade as the recipient of the gas. Columns E and F, respectively, identify the amount of gas nominated and received into Northwest Pipeline’s system, while Columns I and J, respectively, identify the amount of gas nominated and received from Northwest Pipeline into Cascade’s system. Cascade is providing spreadsheet “Tree Top DR 5b - NW Pipeline (C).xlsx” as a confidential document subject to the Protective Order in this proceeding.²

Please also see attached spreadsheet “Tree Top DR 5b - Enbridge (C).xlsx” for Cascade’s ledger of daily receipt/delivery locations for gas received into Cascade’s upstream provider Enbridge’s system and delivered to Cascade’s natural gas system in February 2021. Column A indicates the date on which the gas was received, while Columns B and C provide the volumes of gas purchased at each of the two locations. Finally, Column D lists the volumes of gas actually delivered to Cascade at Huntingdon Cascade Direct Connect. Cascade is providing spreadsheet “Tree Top DR 5b - Enbridge (C).xlsx” as a confidential document subject to the Protective Order in this proceeding.³

Finally, please see attached spreadsheet “Tree Top DR 5b - GTN (C).xlsx” for Cascade’s ledger of daily receipt/delivery locations for gas received into Cascade’s upstream provider GTN’s system and delivered to Cascade’s natural gas system in February 2021. Columns C through AD list daily gas receipt/delivery amounts. Row 2, Columns C through AD, indicate total gas volumes received daily into GTN’s system that were purchased by Cascade at AECO. Relatedly, Rows 3 through 6, Columns C through AD, indicate the total gas volumes received daily into GTN’s system that were purchased by Cascade at AECO, as separated by delivery point (i.e., Prineville, Redmond, South Bend, or Stearns). Row 9, Columns C through AD, indicate total gas volumes received daily into GTN’s system that were purchased by Cascade at OPAL. Relatedly, Rows 10 and 11, Columns C through AD, indicate the total gas volumes received daily into GTN’s system that were purchased by Cascade at OPAL, as separated by delivery point (i.e., Bend or South Bend). Column AE provides totals for the Rows 3 through 6 and 10 through 11 daily gas receipts/deliveries as separated by delivery point. Cascade is providing spreadsheet “Tree Top DR 5b - GTN (C).xlsx” as a confidential document subject to the Protective Order in this proceeding.⁴

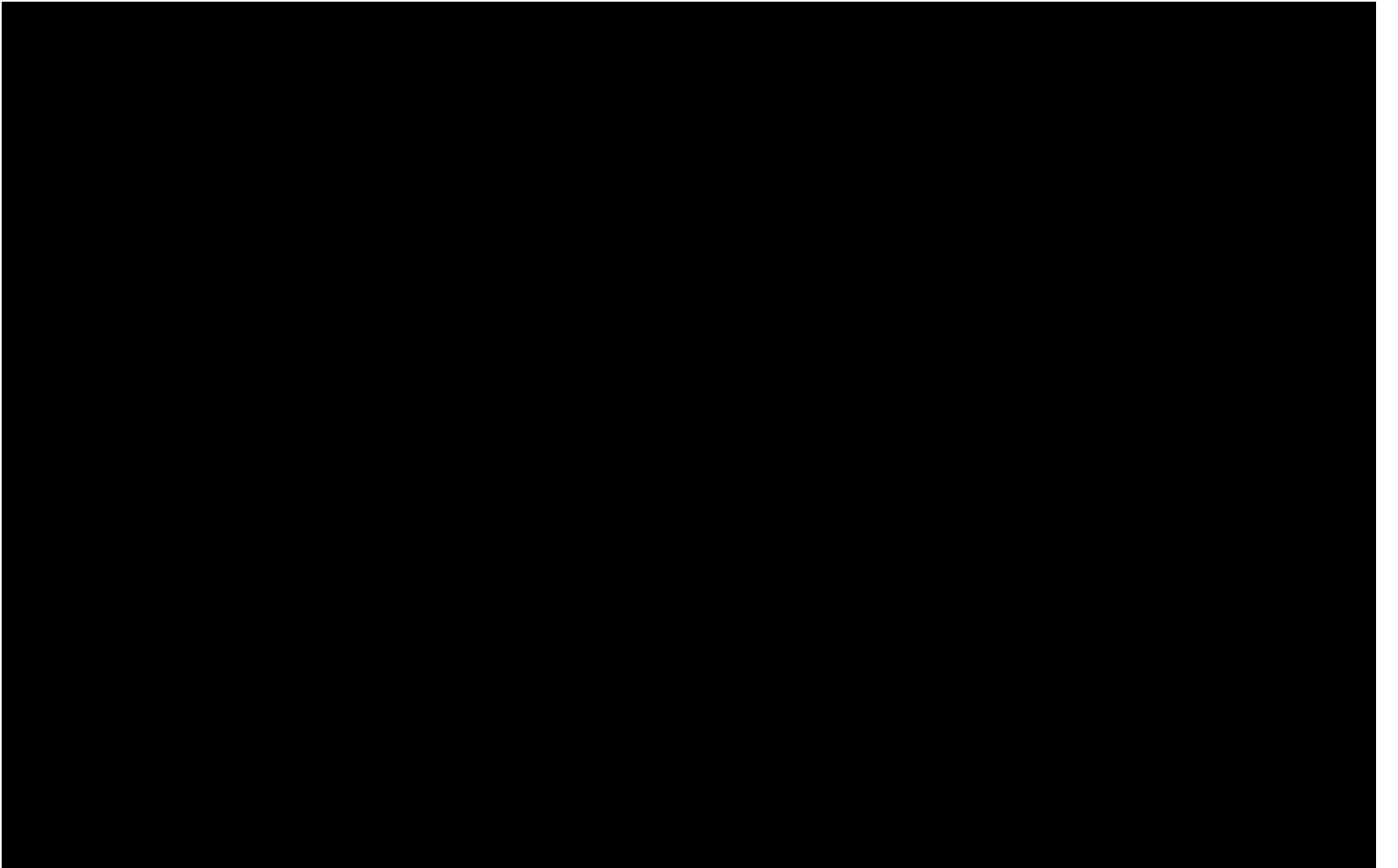
¹ Docket UG-210745, Order No. 03 (Feb. 22, 2022).

² *Id.*

³ *Id.*

⁴ *Id.*

Confidential per Protective Order in UTC Docket UG 210745



CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Second Set of Data Requests

Request No. 16

Date submitted: March 28, 2022
Preparer: Chris Robbins
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 528-9223

TREE TOP REQUEST NO. 16 TO CASCADE:

For each Overrun Entitlement in February 2021, please provide the formal entitlement declaration, including detail of the quantity percentage and/or specific Overrun Entitlement stage declared.

RESPONSE TO REQUEST NO. 16:

Please see Tree Top DR 16 Exhibit.pdf. This email was sent to all Schedule 663 transportation customers, including Tree Top, through its agent CMS.

From: [MDU Gas Supply](#)
Cc: [MDU Gas Supply](#)
Subject: Critical, OTHER, 20210210, NWP, 067977322 [System Tracking #: 00001727807]
Date: Wednesday, February 10, 2021 9:50:08 AM
Attachments: [image001.png](#)

Good Morning,

Cascade will initiate a Stage II (8%) overrun entitlement starting Gas Day Friday February 12th and will continue through Gas Day Tuesday, February 16th. This will apply to all customers on the NWP system. Please align your nominations accordingly to prevent entitlement penalties.

Thanks.

Post Date: 02/10/2021
Category: CRITICAL NOTES

Subcategory: ENTITLEMENT

TSP Name: Northwest Pipeline LLC TSP: 67977322

Critical: Y
Notice Stat Desc: INITIATE
Notice Type Desc: OTHER
Post D/T: 02/10/2021

8:18 AM MCT
Notice Eff D/T: 02/10/2021 8:18 AM MCT
Notice End D/T:
Reqrd Rsp Desc: No response required
Rsp D/T:

Notice ID: 21-016
Prior Notice:
Subject: Stage II (8%) Overrun Entitlement north of Kemmerer

Notice Text:

Due to forecasted cooler temperatures and continued customer drafting negatively impacting Northwest's system balancing capabilities, Northwest is declaring a Stage II (8%) Overrun Entitlement for all Receiving Parties north of the Kemmerer compressor station beginning gas day Friday, February 12, 2021. This entitlement includes all points on the Spokane, Wenatchee and Grants Pass laterals, and shall continue until Tuesday, February 16, 2021.

If you have any questions, please contact your Commercial Services representative or the hotline at 713-215-6301.

Marty Benson



Marty Benson
mbenson@intgas.com
Gas Supply Analyst III
208.377.6121

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Second Set of Data Requests

Request No. 17

Date submitted: March 28, 2022
Preparer: Eric Wood
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 528-9223

TREE TOP REQUEST NO. 17 TO CASCADE:

For each Overrun Entitlement in February 2021, please explain how Cascade determined the specific Overrun Entitlement stage, or percentage, to declare.

RESPONSE TO REQUEST NO. 17:

Cascade typically mirrors the entitlement declaration of its upstream transmission pipeline operator. Cascade ensures its entitlements are equivalent to or more restrictive than that which is declared by its upstream pipeline operator to avoid incurring penalties, minimize exposure to volatility in the market, to maintain the integrity of Cascade's distribution system, and to ensure Cascade's ability to continue to serve its core customers during constrained conditions. For the February 2021 Entitlement period Cascade chose to match the entitlement level of Stage II (8%) of the entitlement issued by Northwest Pipeline. Cascade can and will issue entitlements at more restrictive levels if system needs and resources justify such a need.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Second Set of Data Requests

Request No. 18

Date submitted: March 28, 2022
Preparer: Eric Wood
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 528-9223

TREE TOP REQUEST NO. 18 TO CASCADE:

Please provide detail of each of Cascade's contracts on the Northwest Pipeline, include the reserved capacity, points of receipt, and points of delivery.

RESPONSE TO REQUEST NO. 18:

Please see Tree Top DR 18 Attachment.xlsx wherein Column A indicates the contract number, Columns B and C indicate the points of receipt and delivery, respectively, and Column E ("MDQ") represents the maximum daily quantity of reserved/contracted capacity, which equates to the capacity available to Cascade. Column D indicates that the contracts are on the Northwest Pipeline ("NWP").

CONTRACT DESCRIPTION NWP	RECEIPT	DELIVERY	PIPELINE	MDQ
#100002	all rec	all del	NWP	203123
#135384	jackson prairie	bremerton/mt vernon	NWP	
#135558	sumas	stanfield/portland west	NWP	25400
#139382	sumas	sedro wooley	NWP	6191
#139383	sumas	sedro wooley	NWP	1050
#139384	sumas	sedro wooley	NWP	3259
#100134	sumas/ignacio	burbank/yakima/aberdeen	NWP	330
#100149	sumas/ignacio	walla walla	NWP	75
#100150	sumas/ignacio	menan starch	NWP	160
#139090	sumas	plymouth/umatilla/bellingham	NWP	27063
#139637	sumas	hermiston/oak harbor/selah	NWP	7241
#139630	stanfield	durkee/pendleton/mission	NWP	7450
#140047	sumas	bellingham/ferndale	NWP	15000
#140748	Opal	Portland West/Scappoose	NWP	1000
#140751	stanfield	Portland West/Scappoose	NWP	1000
#140752	stanfield	Portland West/Scappoose	NWP	1000
#142548	jackson prairie	stanfield	NWP	8960
#142972	jackson prairie	jackson prairie/greys harbor	NWP	20,000
#142973	pendleton	pendleton/kennewick/pasco	NWP	20,000
#142967	paouse	plymouth/southridge	NWP	10000
#143078	molalla	Stanfield	NWP	10000
#143550	plymouth	woodland/wenatchee/kalama #2	NWP	2351
#143821	walla walla	walla walla	NWP	1083

NWP TF-2

#100302	jackson prairie	Stanfield, Wenatchee, Longview, Kennewick	NWP	16,789
#100304	plymouth	plymouth	NWP	60,000
#135365	jackson prairie	jackson prairie	NWP	30,000
#100401	jackson prairie	jackson prairie	NWP	16,789
#100601	plymouth	plymouth	NWP	60,000
#140857	plymouth	plymouth	NWP	18,125
#143463	jackson prairie	bellingham	NWP	
#14119	plymouth	plymouth	NWP	10,675
#139624	jackson prairie	bellingham	NWP	3,500
#139622	jackson prairie	jackson prairie	NWP	3,500
#143461	jackson prairie	jackson prairie	NWP	

GTN

#17037	kingsgate	malin	GTN	23,980
#17019	kingsgate	Spokane NPC	GTN	11,558
#17021	kingsgate	Kosmos Farm	GTN	200
#17022	kingsgate	Stanfield City	GTN	232
#17023	kingsgate	Madras	GTN	2,078
#17025	kingsgate	Prineville	GTN	2,984
#17026	kingsgate	Redmond	GTN	2,734
#17028	kingsgate	Bend	GTN	8,927
#17031	kingsgate	Stearns	GTN	2,189
#17033	kingsgate	LaPine	GTN	45
#17034	kingsgate	Gilchrist	GTN	313
#17036	kingsgate	Chemult	GTN	75
#17023	kingsgate	Madras	GTN	331
#17025	kingsgate	Prineville	GTN	827
#17026	kingsgate	Redmond	GTN	662
#17028	kingsgate	Bend	GTN	4,137
#17031	kingsgate	Stearns	GTN	1,241
#17034	kingsgate	Gilchrist	GTN	248
#13687	turquoise flats	stanfield	GTN	10,000
#13688	turquoise flats	stanfield	GTN	5,000
#18507	kingsgate	malin	GTN	10,000

ENBRIDGE

#FI-2583-B-013	station 2	huntingdon	WESTCOAST	20,000
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CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Second Set of Data Requests

Request No. 19

Date submitted: March 28, 2022
Preparer: Eric Wood
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 528-9223

TREE TOP REQUEST NO. 19 TO CASCADE:

Please provide detail of each of Cascade's contracts on the Gas Transmission Northwest pipeline, include the reserved capacity, points of receipt, and points of delivery.

RESPONSE TO REQUEST NO. 19:

Please see Tree Top DR 18 Attachment.xlsx wherein Column A indicates the contract number, Columns B and C indicate the points of receipt and delivery, respectively, and Column E ("MDQ") represents the maximum daily quantity of reserved/contracted capacity, which equates to the capacity available to Cascade. Column D indicates that the contracts are on the Gas Transmission Northwest ("GTN") pipeline.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Second Set of Data Requests

Request No. 21

Date submitted: March 28, 2022
Preparer: Chris Robbins
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 528-9223

TREE TOP REQUEST NO. 21 TO CASCADE:

For each day in which Cascade declared an Overrun Entitlement in February 2021, please state the time and date that Cascade determined the need to declare such entitlement. Please provide supporting documentation, such as an internal memorandum or email supporting the specific time and date that such need was determined.

RESPONSE TO REQUEST NO. 21:

Cascade received notice at 9:26 a.m. CCT on Wednesday, February 10, 2021 that its upstream pipeline operator Northwest Pipeline was declaring a Stage II (8%) overrun entitlement starting Gas Day Friday, February 12, 2021 and continuing through Gas Day Tuesday, February 16, 2021. At 9:37 a.m. CCT on Wednesday, February 10, 2021, Cascade declared an entitlement period on its own system to mirror that entitlement period of its upstream pipeline provider. Please see Tree Top Exhibit DR 21.pdf.

FW: Critical, OTHER, 20210210, NWP, 067977322 [System Tracking #: 00001727807]



Wood, Eric
To: MDU Gas Supply
Cc: Stone, Carolyn; Robbins, Chris

Reply Reply All Forward

Wed 2/10/2021 9:37 AM

From: Northwest Pipeline <svc_nwppassage@williams.com>
Sent: Wednesday, February 10, 2021 7:26 AM
Subject: Critical, OTHER, 20210210, NWP, 067977322 [System Tracking #: 00001727807]

**** WARNING: EXTERNAL SENDER. NEVER click links or open attachments without positive sender verification of purpose. DO NOT provide your user ID or password on sites or forms linked from this email. ****

Please pass along to customers.

"Good Morning,

Cascade will initiate a Stage II (8%) overrun entitlement starting Gas Day Friday February 12th and will continue through Gas Day Tuesday, February 16th. This will apply to all customers on the NWP system. Please align your nominations accordingly to prevent entitlement penalties."

Critical, OTHER, 20210210, NWP, 067977322 [System Tracking #: 00001727807]



Northwest Pipeline <svc_nwppassage@williams.com>
To:

Reply Reply All Forward

Wed 2/10/2021 9:26 AM

**** WARNING: EXTERNAL SENDER. NEVER click links or open attachments without positive sender verification of purpose. DO NOT provide your user ID or password on sites or forms linked from this email. ****

Post Date: 02/10/2021
Category: CRITICAL NOTES

Subcategory: ENTITLEMENT

TSP Name: Northwest Pipeline LLC TSP: 67977322

Critical: Y
Notice Stat Desc: INITIATE
Notice Type Desc: OTHER
Post D/T: 02/10/2021 8:18 AM MCT
Notice Eff D/T: 02/10/2021 8:18 AM MCT
Notice End D/T:
Reqrd Rsp Desc: No response required
Rsp D/T:

Notice ID: 21-016
Prior Notice:
Subject: Stage II (8%) Overrun Entitlement north of Kemmerer

Notice Text:

Due to forecasted cooler temperatures and continued customer drafting negatively impacting Northwest's system balancing capabilities, Northwest is declaring a Stage II (8%) Overrun Entitlement for all Receiving Parties north of the Kemmerer compressor station beginning gas day Friday, February 12, 2021. This entitlement includes all points on the Spokane, Wenatchee and Grants Pass laterals, and shall continue until Tuesday, February 16, 2021.

If you have any questions, please contact your Commercial Services representative or the hotline at 713-215-6301.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Second Set of Data Requests

Request No. 22

Date submitted: March 28, 2022
Preparer: Chris Robbins
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 528-9223

TREE TOP REQUEST NO. 22 TO CASCADE:

For each day in which the Company declared an Overrun Entitlement in February 2021, please provide all workpapers, internal memoranda, and any other relevant documentation supporting Cascade's decision to declare an Entitlement.

RESPONSE TO REQUEST NO. 22:

Cascade received the entitlement period notification from its upstream pipeline provider and decided to declare the same entitlement period. Please see Tree Top Exhibit DR 21.pdf.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Second Set of Data Requests

Request No. 24

Date submitted: March 28, 2022
Preparer: Eric Wood
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 528-9223

TREE TOP REQUEST NO. 24 TO CASCADE:

For each day in February 2021, please provide the midpoint Gas Daily market prices for the following hubs: NW Wyoming Pool, NW south of Green River, Stanfield Oregon, NW Canadian Border (Sumas), or Kern River Opal.

RESPONSE TO REQUEST NO. 24:

Cascade obtains Platts Gas Daily Pricing data (“Platts Data”) from S&P Global Commodity Insights. In accordance with the terms of Cascade’s licensing agreement, Cascade may not disclose Platts Data except under limited circumstances, which include administrative hearings. Cascade is therefore providing the responsive data in confidential attachment Tree Top DR 24 Attachment (C).xlsx, subject to the Protective Order in this proceeding.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Second Set of Data Requests

Request No. 25

Date submitted: March 28, 2022
Preparer: Eric Wood
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 528-9223

TREE TOP REQUEST NO. 25 TO CASCADE:

Please identify each and every curtailment order that Cascade issued in February 2021.

RESPONSE TO REQUEST NO. 25:

Cascade did not issue any curtailment orders in February 2021.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Second Set of Data Requests

Request No. 26

Date submitted: March 28, 2022
Preparer: Eric Wood
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 528-9223

TREE TOP REQUEST NO. 26 TO CASCADE:

Please provide any analysis that Cascade conducted to evaluate whether to issue a curtailment, versus an entitlement, at any time in February 2021.

RESPONSE TO REQUEST NO. 26:

Cascade did not conduct any analysis in February 2021 to determine whether to issue a curtailment versus an entitlement.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Third Set of Data Requests

Request No. 27

Date prepared: March 29, 2022

Preparer: Chris Robbins

Contact: Mike Parvinen

Email: Michael.Parvinen@cngc.com

Telephone: (509) 528-9223

TREE TOP REQUEST NO. 27 TO CASCADE:

Please identify each Overrun Entitlement that Cascade declared over the period January 1, 2017 through December 31, 2021, including the duration of the Overrun Entitlement, and the stage (i.e. Stage I, II & III) associated with the Overrun Entitlement.

RESPONSE TO REQUEST NO. 27:

Please see Tree Top DR 27 Attachment.xlsx.

CNGC Entitlement periods					
From Date	Underrun/Overrun	Location from NWP	Type of Entitlement	End or Change Date	Pipeline
1/11/2017	Overrun	Kennewick & Pasco gates	Stage III (13%)	1/17/2017	NWP
10/10/2018	Overrun	North of Kemmerer	Same-Day Stage I (5%)	10/11/2018	NWP
10/11/2018	Overrun	North of Kemmerer	Stage 1 (3%)	10/11/2018	NWP
10/11/2018	Overrun	Kemmerer to Roosevelt, North of Roosevelt	Stage III (13%)	12/11/2018	NWP
11/16/2018	Overrun	North of Roosevelt	Stage II (8%)	12/11/2018	NWP
11/16/2018	Overrun	Kemmerer to Roosevelt	Stage III (13%)	12/11/2018	NWP
1/18/2019	Overrun	North of Kemmerer	Stage III (13%)	1/22/2019	NWP
2/6/2019	Overrun	North of Kemmerer	Stage II (8%)	2/14/2019	NWP
2/9/2019	Overrun	North of Plymouth	Stage I (3%)	2/14/2019	NWP
2/9/2019	Overrun	Kemmerer to Plymouth Corridor	Stage II (8%)	2/19/2019	NWP
2/14/2019	Overrun	North of Kemmerer	Stage III (13%)	2/16/2019	NWP
2/14/2019	Overrun	North of Plymouth	Stage II (8%)	2/16/2019	NWP
2/16/2019	Overrun	North of Plymouth	Stage III (13%)	2/19/2019	NWP
2/23/2019	Overrun	North of Kemmerer	Stage II (8%)	2/27/2019	NWP
2/23/2019	Overrun	North of Plymouth	Stage II (8%)	2/27/2019	NWP
2/27/2019	Overrun	North of Kemmerer	Stage 1 (3%)	3/6/2019	NWP
2/27/2019	Overrun	North of Plymouth	Stage 1 (3%)	3/6/2019	NWP
3/6/2019	Overrun	North of Plymouth	Stage III (13%)	3/8/2019	NWP
3/8/2019	Overrun	North of Plymouth	Stage II (8%)	3/10/2019	NWP
3/5/2019	Overrun	South of Plymouth (GTN Customers)	Stage I (3%)	3/6/2019	NWP/GTN
3/5/2019	Overrun	North of Plymouth	Stage I (3%)	3/6/2019	NWP
3/6/2019	Overrun	North of Plymouth	Stage II (8%)	3/10/2019	NWP
3/10/2019	Overrun	North of Plymouth	Stage III (13%)	3/14/2019	NWP
10/3/2019	Overrun	North of Roosevelt	Stage III (13%)	10/14/2019	NWP
11/23/2019	Overrun	North of Plymouth South Constraint	Stage III (13%)	12/5/2019	NWP
1/11/2020	Overrun	North of Kemmerer	Stage II (8%)	1/16/2020	NWP
3/11/2020	Overrun	North of Kemmerer	Stage II (8%)	3/19/2020	NWP
9/8/2020	Underrun	North of Kemmerer	Stage III (13%)	9/18/2020	NWP
9/30/2020	Underrun	North of Kemmerer	Stage III (13%)	10/3/2020	NWP
2/12/2021	Overrun	North of Kemmerer, includes Spokane/Wenatchee & Grants Pass	Stage II (8%)	2/16/2021	NWP

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Third Set of Data Requests

Request No. 28

Date prepared: March 29, 2022

Preparer: Chris Robbins

Email: Michael.Parvinen@cngc.com

Contact: Mike Parvinen

Telephone: (509)-528-9223

TREE TOP REQUEST NO. 28 TO CASCADE:

Please identify each Underrun Entitlement that Cascade declared over the period January 1, 2017 through December 31, 2021, including the duration of the Underrun Entitlement.

RESPONSE TO REQUEST NO. 28:

Please see Tree Top DR 27 Attachment.xlsx.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Third Set of Data Requests

Request No. 29

Date prepared: March 29, 2022

Preparer: Eric Wood

Contact: Mike Parvinen

Email: Michael.Parvinen@cngc.com

Telephone: (509) 528-9223

TREE TOP REQUEST NO. 29 TO CASCADE:

Reference Cascade's Response to Tree Top Data Request 1, Tree Top DR 1-3 Attachment:
Please provide the equivalent nomination and load data for the four Tree Top, Inc. Facilities in Cascade's service area (the Main Selah Plant, the Ross Plant, the Wenatchee Plant and Prosser Plant) over the period January 1, 2020 through December 31, 2021 (inclusive).

RESPONSE TO REQUEST NO. 29:

Please see Tree Top DR 29 Attachment.xlsx.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Third Set of Data Requests

Request No. 31

Date prepared: March 29, 2022

Preparer: Eric Wood

Contact: Mike Parvinen

Email: Michael.Parvinen@cngc.com

Telephone: (509) 528-9223

TREE TOP REQUEST NO. 31 TO CASCADE:

31. Please provide Cascade's ledger of all gas purchase and sales transactions with deliveries over the period February 1, 2021 through February 28, 2021, other than the long-term transactions identified in response to Tree Top Data Request 5. For each transaction, please provide all fields stored in Cascades energy information system, including, but not limited to, the counterparty, buy/sell, the delivery start and end date and time, the date the transaction was executed, volume of gas transacted, the price of the gas transacted, the market hub where the gas was transacted, the point of receipt/delivery, and any other relevant information stored in Cascade's information system.

RESPONSE TO REQUEST NO. 31:

Cascade has no further transactions for February 2021 other than those originally provided in Cascade's Response to Tree Top Data Request No. 5.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Third Set of Data Requests

Request No. 32

Date submitted: March 29, 2022
Preparer: Eric Wood
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 528-9223

TREE TOP REQUEST NO. 32 TO CASCADE:

Reference Cascade's response to Tree Top Data Request 5, Tree Top DR 5a (C): Please identify the equivalent S&P Gas Daily market hub for each of the locations identified in Excel column "C" of the referenced workpaper.

RESPONSE TO REQUEST NO. 32:

The equivalent S&P Gas Daily market hub for each of the locations identified in Excel column "C" of Cascade's Response to Tree Top Data Request No. 5 is as follows:

<u>Location</u>	<u>S&P Gas Daily Market Hub</u>
AECO	Aeco Gas Daily
WY POOL	NW, Wyo Pool
RM POOL	NW, S of Green River, or NW Rocky Mtn Pool
HUNT	Gas Daily Sumas
OPAL	Kern River Opal
STATION2	Station 2

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Thrid Set of Data Requests

Request No. 34

Date prepared: March 29, 2022

Preparer: Eric Wood

Contact: Mike Parvinen

Email: Michael.Parvinen@cngc.com

Telephone: (509) 528-9223

TREE TOP REQUEST NO. 34 TO CASCADE:

Reference Cascade's response to Tree Top Data Request 5, Tree Top DR 5b - GTN (C), Excel Rows 9:11: Please explain how the Gas Delivered from OPAL, which is not connected with the GTN pipeline is delivered to the GTN pipeline.

RESPONSE TO REQUEST NO. 34:

Gas received at OPAL can be delivered to GTN via the Ruby Pipeline at Turquoise Flats.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Third Set of Data Requests

Request No. 36

Date prepared: March 29, 2022

Preparer: Eric Wood

Contact: Mike Parvinen

Email: Michael.Parvinen@cngc.com

Telephone: (509)-528-9223

TREE TOP REQUEST NO. 36 TO CASCADE:

Please identify any Overrun Entitlements declared by NW Pipeline, the GTN Pipeline, and/or the Enbridge Pipeline in February 2021, as well as the stage of the Overrun Entitlement.

RESPONSE TO REQUEST NO. 36:

Northwest Pipeline posted a Stage II (8%) overrun entitlement on 2/10/2021 for an effective date of February 12th-February 16th. Neither GTN nor Enbridge issued an entitlement for the February 2021 timeframe.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Third Set of Data Requests

Request No. 37

Date prepared: March 29, 2022

Preparer: Eric Wood

Contact: Mike Parvinen

Email: Michael.Parvinen@cngc.com

Telephone: (509) 528-9223

TREE TOP REQUEST NO. 37 TO CASCADE:

Please identify all Overrun Entitlement charges or penalties assessed to Cascade by NW Pipeline, the GTN Pipeline, and/or the Enbridge Pipeline in February 2021.

RESPONSE TO REQUEST NO. 37:

There were no penalties assessed to Cascade by any pipelines for February 2021.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Third Set of Data Requests

Request No. 38

Date submitted: March 29, 2022
Preparer: Mike Parvinen
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 528-9223

TREE TOP REQUEST NO. 38 TO CASCADE:

Does Cascade consider the Overrun Entitlement charges specified in Schedule 663 to be a penalty, a rate, a charge, a toll, or some other form of remuneration. Please explain.

RESPONSE TO REQUEST NO. 38:

Cascade considers the overrun entitlement charges specified in Schedule 663 to be a penalty designed to encourage transportation customers to align their gas usage with the amounts they nominate. The penalty is designed to be a disincentive to customers paying a penalty in lieu of securing adequate supply, to avoid harm to the integrity and reliability of Cascade's system and to protect Cascade's core customers from any financial consequences. Gas shortages caused by transportation customers using significantly more gas than they nominate or, moving gas away from the region to take advantage of market spreads during constraint periods could lead to shortages affecting critical facilities—such as hospitals and schools—and could lead to outages for residential and commercial customers. Such significant shortages could also ultimately lead to catastrophic system failures, posing a threat to the entire region.

CASCADE NATURAL GAS CORPORATION
UG 210745
Responses to Tree Top, Inc.'s Third Set of Data Requests

Request No. 39

Date submitted: March 29, 2022
Preparer: Eric Wood
Contact: Mike Parvinen
Email: Michael.Parvinen@cngc.com
Telephone: (509) 528-9223

TREE TOP REQUEST NO. 39 TO CASCADE:

Reference Tree Top Data Request 24 to Cascade: Please provide the midpoint Gas Daily market prices for the following hubs: NW Wyoming Pool, NW south of Green River, Stanfield Oregon, NW Canadian Border (Sumas), or Kern River Opal over the period January 1, 2020 through December 31, 2021 (inclusive). (Note the original request only requested the data for February 2021).

RESPONSE TO REQUEST NO. 39:

Cascade obtains Platts Gas Daily Pricing data ("Platts Data") from S&P Global Commodity Insights. In accordance with the terms of Cascade's licensing agreement, Cascade may not disclose Platts Data except under limited circumstances, which include administrative hearings. Please see Tree Top DR 24 Attachment (C).xlsx, subject to the Protective Order in this proceeding, for data responsive to this request.