BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

TREE TOP, INC., a Washington Corporation
Complainant,
v.
CASCADE NATURAL GAS CORPORATION, a Washington Corporation
Respondent.

DOCKET UG-210745

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.”
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.”
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.”
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 counterparty 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 (counterparty 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
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.
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.
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.

If you have any questions, please contact your Commercial Services representative or the hotline at 713-215-6301.
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”).
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NWP TF-2

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ENBRIDGE

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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: [Email address]
Cc: [Email address] [Email address]

** 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>

** 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 Set Desc: INITIATE
Notice Type Desc: OTHER
Post DT: 02/10/2021 8:38 AM MCT
Notice BT DT: 02/10/2021 8:38 AM MCT
Notice End DT: 02/16/2021 8:38 AM MCT
Resp Req Desc: No response required
Resp DT:
Notice ID: 21-016
Prior Notice:
Subject: Stage II (8%) Ovrun Entitlement north of Kammanee

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%) Ovrun Entitlement for all Receiving Parties north of the Kamnnerer compressor station beginning gas day Friday, February 12, 2021. This entitlement includes all points on the Spokane, Wrennchase 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.
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.
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.
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.
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.
<table>
<thead>
<tr>
<th>From Date</th>
<th>Underrun/Overrun</th>
<th>Location from NWP</th>
<th>Type of Entitlement</th>
<th>End or Change Date</th>
<th>Pipeline</th>
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<tbody>
<tr>
<td>1/11/2017</td>
<td>Overrun</td>
<td>Kennewick &amp; Pasco gates</td>
<td>Stage III (13%)</td>
<td>1/17/2017</td>
<td>NWP</td>
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<tr>
<td>10/10/2018</td>
<td>Overrun</td>
<td>North of Kemmerer</td>
<td>Same-Day Stage I (5%)</td>
<td>10/11/2018</td>
<td>NWP</td>
</tr>
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<td>10/11/2018</td>
<td>Overrun</td>
<td>North of Kemmerer</td>
<td>Stage I (3%)</td>
<td>10/11/2018</td>
<td>NWP</td>
</tr>
<tr>
<td>10/11/2018</td>
<td>Overrun</td>
<td>Kemmerer to Roosevelt, North of Roosevelt</td>
<td>Stage III (13%)</td>
<td>12/11/2018</td>
<td>NWP</td>
</tr>
<tr>
<td>11/16/2018</td>
<td>Overrun</td>
<td>North of Roosevelt</td>
<td>Stage II (8%)</td>
<td>12/11/2018</td>
<td>NWP</td>
</tr>
<tr>
<td>11/16/2018</td>
<td>Overrun</td>
<td>Kemmerer to Roosevelt</td>
<td>Stage III (13%)</td>
<td>12/11/2018</td>
<td>NWP</td>
</tr>
<tr>
<td>1/18/2019</td>
<td>Overrun</td>
<td>North of Kemmerer</td>
<td>Stage III (13%)</td>
<td>1/22/2019</td>
<td>NWP</td>
</tr>
<tr>
<td>2/6/2019</td>
<td>Overrun</td>
<td>North of Kemmerer</td>
<td>Stage II (8%)</td>
<td>2/14/2019</td>
<td>NWP</td>
</tr>
<tr>
<td>2/9/2019</td>
<td>Overrun</td>
<td>North of Plymouth</td>
<td>Stage I (3%)</td>
<td>2/14/2019</td>
<td>NWP</td>
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<tr>
<td>2/9/2019</td>
<td>Overrun</td>
<td>Kemmerer to Plymouth Corridor</td>
<td>Stage II (8%)</td>
<td>2/19/2019</td>
<td>NWP</td>
</tr>
<tr>
<td>2/14/2019</td>
<td>Overrun</td>
<td>North of Kemmerer</td>
<td>Stage III (13%)</td>
<td>2/16/2019</td>
<td>NWP</td>
</tr>
<tr>
<td>2/14/2019</td>
<td>Overrun</td>
<td>North of Plymouth</td>
<td>Stage II (8%)</td>
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<td>NWP</td>
</tr>
<tr>
<td>2/16/2019</td>
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<td>Stage III (13%)</td>
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<td>Stage II (8%)</td>
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<td>NWP</td>
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<td>Overrun</td>
<td>North of Kemmerer</td>
<td>Stage I (3%)</td>
<td>3/6/2019</td>
<td>NWP</td>
</tr>
<tr>
<td>2/27/2019</td>
<td>Overrun</td>
<td>North of Plymouth</td>
<td>Stage I (3%)</td>
<td>3/6/2019</td>
<td>NWP</td>
</tr>
<tr>
<td>3/6/2019</td>
<td>Overrun</td>
<td>North of Plymouth</td>
<td>Stage III (13%)</td>
<td>3/8/2019</td>
<td>NWP</td>
</tr>
<tr>
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<td>Overrun</td>
<td>North of Plymouth</td>
<td>Stage II (8%)</td>
<td>3/10/2019</td>
<td>NWP</td>
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<tr>
<td>3/5/2019</td>
<td>Overrun</td>
<td>South of Plymouth (GTN Customers)</td>
<td>Stage I (3%)</td>
<td>3/6/2019</td>
<td>NWP/GTN</td>
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<td>Overrun</td>
<td>North of Plymouth</td>
<td>Stage I (3%)</td>
<td>3/6/2019</td>
<td>NWP</td>
</tr>
<tr>
<td>3/6/2019</td>
<td>Overrun</td>
<td>North of Plymouth</td>
<td>Stage II (8%)</td>
<td>3/10/2019</td>
<td>NWP</td>
</tr>
<tr>
<td>3/10/2019</td>
<td>Overrun</td>
<td>North of Plymouth</td>
<td>Stage III (13%)</td>
<td>3/14/2019</td>
<td>NWP</td>
</tr>
<tr>
<td>10/3/2019</td>
<td>Overrun</td>
<td>North of Roosevelt</td>
<td>Stage III (13%)</td>
<td>10/14/2019</td>
<td>NWP</td>
</tr>
<tr>
<td>11/23/2019</td>
<td>Overrun</td>
<td>North of Plymouth South Constraint</td>
<td>Stage III (13%)</td>
<td>12/5/2019</td>
<td>NWP</td>
</tr>
<tr>
<td>1/11/2020</td>
<td>Overrun</td>
<td>North of Kemmerer</td>
<td>Stage II (8%)</td>
<td>1/16/2020</td>
<td>NWP</td>
</tr>
<tr>
<td>3/11/2020</td>
<td>Overrun</td>
<td>North of Kemmerer</td>
<td>Stage II (8%)</td>
<td>3/19/2020</td>
<td>NWP</td>
</tr>
<tr>
<td>9/8/2020</td>
<td>Underrun</td>
<td>North of Kemmerer</td>
<td>Stage III (13%)</td>
<td>9/18/2020</td>
<td>NWP</td>
</tr>
<tr>
<td>9/30/2020</td>
<td>Underrun</td>
<td>North of Kemmerer</td>
<td>Stage III (13%)</td>
<td>10/3/2020</td>
<td>NWP</td>
</tr>
<tr>
<td>2/12/2021</td>
<td>Overrun</td>
<td>North of Kemmerer, includes Spokane/Wenatchee &amp; Grants Pass</td>
<td>Stage II (8%)</td>
<td>2/16/2021</td>
<td>NWP</td>
</tr>
</tbody>
</table>
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.
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.
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 that those originally provided in Cascade’s Response to Tree Top Data Request No. 5.
CASCA D E 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:

<table>
<thead>
<tr>
<th>Location</th>
<th>S&amp;P Gas Daily Market Hub</th>
</tr>
</thead>
<tbody>
<tr>
<td>AECO</td>
<td>Aeco Gas Daily</td>
</tr>
<tr>
<td>WY POOL</td>
<td>NW, Wyo Pool</td>
</tr>
<tr>
<td>RM POOL</td>
<td>NW, S of Green River, or NW Rocky Mtn Pool</td>
</tr>
<tr>
<td>HUNT</td>
<td>Gas Daily Sumas</td>
</tr>
<tr>
<td>OPAL</td>
<td>Kern River Opal</td>
</tr>
<tr>
<td>STATION2</td>
<td>Station 2</td>
</tr>
</tbody>
</table>
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.
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.
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 renumeration. 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.