BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

CASCADE NATURAL GAS CORPORATION

Petition for an Accounting Order Associated with COVID-19 Public Health Emergency

DOCKET NO. UG-200479

PETITION

I. INTRODUCTION

I Pursuant to WAC 480-07-370(3)(b) and 480-90-203, Cascade Natural Gas Corporation ("Cascade" or the "Company") files this petition ("Petition") with the Washington Utilities and Transportation Commission (the "Commission") seeking authorization for an accounting order to allow the use of deferred accounting, from the date of this Petition forward, for costs associated with the recent COVID-19 public health emergency. As described more fully below, Cascade anticipates that the emergency, overall, will result in costs to customers that the Company seeks to defer for later rate-making treatment.

II. BACKGROUND

2 Cascade is a natural gas utility and public service company doing business in the State of Washington and is subject to the jurisdiction of the Commission regarding rates, service, and accounting practices. The Company's principal place of business is 8113 W. Grandridge Blvd., Kennewick, Washington 99336.

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III. COMMUNICATIONS

3 Communications regarding this Petition should be addressed to:

Cascade Natural Gas Regulatory Affairs 8113 W. Grandridge Blvd. Kennewick, WA 99336 Telephone: (509) 734-4593 Email: cngcregulatory@cngc.com

4 In addition, Cascade respectfully request that all data requests be addressed to:

Regulatory Affairs cngcregulatory@cngc.com

IV. REASONS FOR REQUEST FOR DEFERRED ACCOUNTING

5 On February 29, 2020, Washington Governor Inslee declared a state of emergency over the COVID-19 pandemic. Cascade has suspended all service disconnections and late payment fees in order to help limit the impact on customers as they navigate these difficult economic times. The public health emergency is expected to drive significant accounts receivable write-off expense. The Company also expects to experience other costs related to the emergency that the Company is currently unable to predict. Cascade will document all costs known to be incurred by the COVID-19 public health emergency. Due to the unpredictable and unprecedented nature of the emergency, these costs are not currently recovered in rates, outside normal business risk, and, accordingly, Cascade requests to recover these expenses through deferred accounting.

V. PROPOSED ACCOUNTING TREATMENT

6 Beginning on May 27, 2020, Cascade proposes to account for the expenses incurred as a result of COVID-19 by recording a deferral, in Account 186. In the absence of approval of deferred accounting, Cascade would record costs associated with the COVID-19 Page 2 –CASCADE'S PETITION FOR AN ACCOUNTING ORDER

public health emergency to various expense accounts.

7 Cascade may determine, as it works through the accounting specifics, that other accounts will be used also.

VI. ESTIMATED AMOUNTS SUBJECT TO DEFERRAL

8 Cascade is unable to predict an estimate of incurred expense related to COVID- 19 while the emergency is still fluid and changing rapidly.

VII. CONCLUSION

9 Cascade respectfully requests that the Commission issue an accounting order authorizing the Company to defer the costs described in this Petition.

Dated this 27th day of May 2020.

Respectfully Submitted,

<u>/s/ Michael Parvinen</u> Cascade Natural Gas Michael Parvinen Director, Regulatory Affairs 8113 W. Grandridge Blvd. Kennewick, WA 99336 Phone: (509) 734-4593 Email: <u>michael.parvinen@cngc.com</u>