

CASCADE NATURAL GAS CORPORATION
Washington Utilities & Transportation Commission
2006 Rate Case Data Request

Request No. 144

Date prepared: July 11, 2006

Preparer: Jon Stoltz

Likely Witness: Jay Cummings

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WUTC STAFF DATA REQUEST NO. 144:

Re: Direct testimony of F. Jay Cummings (Safety & Reliability Infrastructure Adjustment Mechanism)

Please provide definitions of the terms reinforcement and replacement.

Response:

The testimony of Jay Cummings, Exhibit __ (FJC-1T), page 2, starting at line 22 defines the terms. The testimony on line 22 that states: “(a) mains, service lines, and related facilities that replace existing facilities that have worn out or are in deteriorated condition” conveys the meaning of “replacements.” The testimony on line 23 that states: “(b) facility relocations required due to highway and other public works projects by or on behalf of any government agency provided that the costs related to such projects have not been completely reimbursed to the Company” conveys the meaning of “relocations.” The testimony on line 26 that states: “(c) additional mains, gate station facility expansions, compressed natural gas and liquefied natural gas equipment or any other infrastructure improvements designed to improve the reliability and/or capacity of the distribution system during peak weather events” conveys the meaning of “reinforcements.”