

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	DOCKET NOS. UG 210755 AND UG 220198
	)	
Complainant,	)	ALLIANCE OF WESTERN ENERGY CONSUMERS' RESPONSE TO NOTICE OF INTENT TO CONSOLIDATE
v.	)	
CASCADE NATURAL GAS CORPORATION	)	
	)	
Respondent.	)	
<hr style="border: 0.5px solid black;"/>		

1. On March 29, 2022, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Intent to Consolidate Dockets UG-210755 and 220198, which involve Cascade’s general rate case filing and certain proposed tariff revisions arising out of the Private Letter Ruling the Internal Revenue Service issued to Puget Sound Energy on July 30, 2021. The Commission determined that the “tariff revisions proposed in Docket UG-220198 share common issues of fact and law with the tariff revisions proposed in the Company’s GRC in Docket UG 210755.”

2. While the Alliance of Western Energy Consumers (AWEC) is concerned with the timing of the May 24, 2022 filing, and that the proposal was not included in Cascade’s general rate case, AWEC does not oppose the consolidation of these dockets, because these types of issues should be addressed in general rate filings, and not through a separate single-issue case. Although the timing is tight, with a small modification to the existing schedule, AWEC believes that the parties will have time to address the issues raised in Docket UG 220198. AWEC requests that

the discovery turnaround for the consolidated dockets be modified to 5 business days immediately, and would request a one week extension of the due date for all parties to file testimony on UG 220198 issues only. AWEC requests that all the remaining dates, including the April 25, 2022, due date for the Opposing Parties to file Response Testimony, stay in place. AWEC's recommended schedule for the consolidated dockets is as follows:

Opposing Parties Response Testimony and Exhibits	<b>April 25, 2022</b>
Settling Parties Joint Rebuttal Testimony and Exhibits; Staff, Public Counsel, and Intervenor Cross-Answering Testimony and Exhibits	<b>May 2, 2022</b>
<u>All Party Testimony on UG 220198 Issues</u>	<b><u>May 2, 2022</u></b>
Evidentiary Hearing	<b>June 1 and 2, 2022 at 9 a.m.</b>
<u>Discovery Turnaround</u>	<b><u>5 business days effective as of the date of consolidation.</u></b>

3. The issues in UG 220198, to the extent not fully addressed in testimony, can be explored at the June 1 and 2 evidentiary hearing. In the alternative, if the Commission does not consolidate these dockets, AWEC recommends that the Private Letter Ruling issues be explored in Cascade's next general rate case and not through a single-issue rate filing.

Dated: April 5, 2022.

Respectfully submitted,




---

Chad M. Stokes, WSB 37499, OSB 00400  
 Cable Huston LLP  
 1455 SW Broadway, Suite 1500  
 Portland, OR 97201  
 E-mail: cstokes@cablehuston.com  
 Attorneys for AWEC

PAGE 2 – AWEC'S RESPONSE TO NOTICE OF INTENT TO CONSOLIDATE