

**BEFORE THE**  
**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS  
CORPORATION,

Respondent.

DOCKET UG-240008

**CASCADE NATURAL GAS CORPORATION**

**TWELFTH EXHIBIT TO THE**  
**DIRECT TESTIMONY OF ANN E. BULKLEY**

**March 29, 2024**

COMPARISON OF RRA JURISDICTIONAL RANKINGS

	Operation State	[1]	[2]
		RRA	
		Rank	Numeric Rank
Atmos Energy Corporation	Colorado	Average/1	4.0
	Kansas	Below Average/1	7.0
	Kentucky	Average/2	5.0
	Louisiana — PSC	Average/2	5.0
	Mississippi	Above Average/3	3.0
	Tennessee	Above Average/3	3.0
	Texas — RRC	Average/1	4.0
	Virginia	Average/2	5.0
NiSource Inc.	Indiana	Average/1	4.0
	Kentucky	Average/2	5.0
	Maryland	Below Average/2	8.0
	Ohio	Average/2	5.0
	Pennsylvania	Above Average/2	2.0
	Virginia	Average/2	5.0
Northwest Natural Gas Company	Oregon	Average/2	5.0
	Washington	Average/3	6.0
ONE Gas, Inc.	Kansas	Below Average/1	7.0
	Oklahoma	Average/3	6.0
	Texas — RRC	Average/1	4.0
Spire, Inc.	Alabama	Above Average/1	1.0
	Missouri	Average/3	6.0
	Mississippi	Above Average/3	3.0
Proxy Group Average		Average/1 to Average/2	4.7
Cascade Natural Gas Corporation	Washington	Average/3	6.0

Notes

[1] State Regulatory Evaluations, Regulatory Research Associates, December 4, 2023.

[2] AA/1= 1, AA/2= 2, AA/3= 3, A/1= 4, A/2= 5, A/3=6, BA/1= 7, BA/2= 8, BA/3= 9