Service Date: April 18, 2018



STATE OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250 (360) 664-1160 • TTY (360) 586-8203

April 18, 2018

Re: Cascade Natural Gas Corporation's 2016 Integrated Resource Plan, Docket UG-160453

TO ALL PARTIES:

On December 14, 2016, Cascade Natural Gas Corporation (Cascade or Company) filed its 2016 Integrated Resource Plan (IRP or Plan) with the Washington Utilities and Transportation Commission (Commission), and presented it at the Recessed Open Meeting on March 29, 2017.

On July 24, 2017, the Commission filed a letter in this docket addressed to Cascade (Compliance Acknowledgement Letter), stating that it found that the Plan met the minimum planning requirements of Washington Administrative Code 480-90-238, but noted that the Commission still had serious concerns. The Compliance Acknowledgement Letter directed Cascade to file three quarterly progress reports addressing several issues identified in the Compliance Acknowledgement Letter, its attachment, and the 2016 IRP Two-year Action Plan.

Cascade filed the requested reports on September 29, 2017, December 22, 2017, and March 30, 2018 (Quarterly Reports).

On April 10, 2018, Commission staff (Staff) filed a letter in this docket (Staff's Response Letter) stating that it had reviewed the Quarterly Reports, and that while Staff is satisfied with the company's progress in most areas, there are a few remaining items Staff would like addressed. Staff requests that Cascade be required to file one more status report by June 30, 2018, which should:

- 1. Provide detailed justification for using weather data other than from the National Oceanic and Atmospheric Administration (NOAA), and verify the reliability of such data;
- Identify the cost of risks associated with environmental effects of emissions of carbon dioxide it will use in its IRP, and describe how the calculation of such cost will be accomplished;
- 3. Provide the date by which the Conservation Potential Assessment will be completed;
- 4. Provide calculation of the economic potential of conservation within the IRP, or anticipated date of completion of such calculation;

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5. Report on the status of Cascade's commitment to an expanded discussion of distribution resource planning to include date of resource need, analysis of least cost reasonable resources, and the alternatives considered;

- 6. Provide comparison between its growth forecast and information from the state economic report;
- 7. State whether proposals presented by NWP would modify delivery rights to meet potential shortfalls, or would otherwise address shortfall concerns; and
- 8. Clarify response regarding incorporation of the citygate study into the IRP.

The Commission has reviewed the Quarterly Reports, and finds that they, for the most part, comply with the requirements of the Compliance Acknowledgement Letter. The Commission directs Cascade to file a further report no later than June 30, 2018, that addresses the issues enumerated above and in detail in Staff's Response Letter.

Sincerely,

STEVEN V. KING Executive Director and Secretary