

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS
CORPORATION,

Respondent.

In the Matter of Cascade Natural Gas
Corporation's Tariff WN U-3 Revisions

DOCKET UG-210755

PUBLIC COUNSEL'S RESPONSE
TO NOTICE OF INTENT TO
CONSOLIDATE

DOCKET UG-220198

- I.* Pursuant to the Washington Utilities and Transportation Commission's ("Commission") Notice of Intent to Consolidate, issued on March 29, 2022, the Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") files this response in opposition to the proposed consolidation of Dockets UG-220198 and UG-210755, which involve two separate tariff revision requests of Cascade Natural Gas Corporation ("Cascade" or "the Company") filed several months apart in time. Public Counsel recommends that the Commission not consolidate Docket UG-220198 with Docket UG-210755, deny Cascade's request in Docket UG-220198, and order Cascade to refile the request in Docket UG-220198 in Cascade's next general rate case (GRC). Public Counsel recommends addressing Docket UG-220198 in a later GRC to avoid single issue ratemaking in a separate rate proceeding. In the alternative, if the Commission consolidates the two matters, Public Counsel requests that the Commission revisit

the procedural schedule to allow more time for adequate discovery and for testimony to address both dockets.

2. Public Counsel recommends against consolidation of Docket UG-220198 with Docket UG-210755 for the following reasons:

- The rate impacts of Cascade’s request in Docket UG-220198 are unclear in the Request, and would require discovery to ascertain;
- The request in Docket UG-220198 has the potential to materially alter rates and therefore deserves to be fully examined in a GRC where there is sufficient time to analyze the impacts of the filing;
- In the current procedural schedule for Docket UG-210755, there is only enough time for one 10-business-day round of data requests to analyze the request in Docket UG-220198, which offers no time for subsequent rounds of data requests to clarify any ambiguities or issues raised in the responses to the first round of data requests; and
- There is a full multiparty settlement proposed in Docket UG-210755, which would no longer be considered a “full” settlement, and additional filings would be required that are not contemplated in the current effective procedural schedule for Docket UG-210755.

3. For the foregoing reasons, Public Counsel recommends that the Commission not consolidate Cascade’s request in Docket UG-220198 with Cascade’s earlier GRC request in Docket UG-210755, deny the request in Docket UG-220198, and order Cascade to refile the

request in Docket UG-220198 with Cascade’s next GRC filing. Public Counsel recommends that the Commission address Docket UG-220198 in a later GRC to avoid single issue ratemaking on these issues in a separate rate proceeding. Lastly, in the alternative, if the Commission consolidates the two matters, Public Counsel requests that the Commission revisit the procedural schedule to allow more time for adequate discovery and for testimony to address both dockets.

Dated this 5th day of April, 2022.

ROBERT W. FERGUSON
Attorney General

/s/ *Ann Paisner*

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