

December 1, 2017

Steven King, Executive Director and Secretary Washington Utilities and Transportation Commission Attn: Records Center 1300 S. Evergreen Park Drive SW Olympia, WA 98504-7250

Re: CNG/W17-12-01, Housekeeping

Cascade Natural Gas Corporation (Cascade or the Company) files herewith the following revisions to its Tariff, WN U-3, stated to become effective with service on and after February 1, 2018:

Seventh Revision of Sheet No. 1 Original Sheet No. 4 Second Revision of Sheet No. 5 Fifth Revision of Sheet No. 6 Fifth Revision of Sheet No. 6-A Original Sheet No. 6-B Fourth Revision of Sheet No. 7 Seventh Revision of Sheet No. 8 Original Sheet No. 8-A Original Sheet No. 8-B Twelfth Revision of Sheet No. 9 Second Revision of Sheet No. 9-A Original Sheet No. 9-B Twelfth Revision of Sheet No. 10 Ninth Revision of Sheet No. 10-A Third Revision of Sheet No. 10-B Original Sheet No. 10-C Fifth Revision of Sheet No. 11 First Revision of Sheet No. 11-A Eleventh Revision of Sheet No. 12 Second Revision of Sheet No. 12-A Second Revision of Sheet No. 12-B Fourth Revision of Sheet No. 14

Second Revision of Sheet No. 17 Second Revision of Sheet No. 18 Second Revision of Sheet No. 19 Sixth Revision of Sheet No. 21 Sixth Revision of Sheet No. 21-A Fifth Revision of Sheet No. 22 First Revision of Sheet No. 23 First Revision of Sheet No. 23-A Ninth Revision of Sheet No. 300 Sixth Revision of Sheet No. 300-A Fifth Revision of Sheet No. 301 First Revision of Sheet No. 301-A Eighth Revision of Sheet No. 302 Fifth Revision of Sheet No. 302-A Original Sheet No. 302-B Second Revision of Sheet No. 303 Second Revision of Sheet No. 303-A First Revision of Sheet No. 303-B Seventy-Sixth Revision of Sheet No. 500 Fifty-Fifth Revision of Sheet No. 500-A Second Revision of Sheet No. 500-B

Original Sheet No. 500-C

The Company also seeks to withdraw the following sheets:

Second Revision of Sheet No. 15 First Revision of Sheet No. 16 Records Manageme

First Revision of Sheet No. 20 Fourth Revision of Sheet No. 21-B

This filing updates much the Company's tariff book by modernizing formatting, adding content to ensure the Tariff meets the requirements of the Washington Administrative Code (WAC), revising language for greater clarity, and removing elements that are no longer valid or necessary. The Company's tariff book has been in place since 1963 and few comprehensive housekeeping filings have been submitted over the past 53 years.

On July 31, 2017, Cascade filed a general rate case, docketed as UG-170855, that included proposed tariff book WN U-4. Had this proposed tariff book been approved, it would have replaced the Company's current tariff book in its entirety. Due to Staff's dissatisfaction with the Company's filing, Staff filed a Motion to Reject the Company's rate case (Motion). The Company responded by withdrawing its case. Staff's Motion as well as subsequent conversations with Staff clarified Staff's preference to receive wholesale tariff changes in advice filings, rather than in rate cases.¹

After withdrawing its rate case, Cascade filed a new rate case (UG-170929) that seeks to revise only the tariff sheets in the Company's current tariff book, WN U-3, which are impacted by the proposed rate changes discussed in the case. This housekeeping filing revises most of the tariff sheets that are not included in UG-170929. To complete all the revisions to its tariff book that the Company was hoping to achieve with its initial filing in UG-170855, the Company will need to make one more subsequent housekeeping filing after the conclusion of the compliance filing in UG 170929.

This housekeeping filing is revising sheets within the current tariff book as noted by the sheet revision number in the upper right margin of the tariff sheet, and changes are noted with margin codes. The changes herein are numerous, and since coding is a somewhat subjective endeavor, the Company clarifies that it has used the margin code (T) liberally for areas where text is added or revised but where the edits do not result in a change to a condition or regulation.

Although Staff's Motion deems the tariff changes proposed in UG-170855 and here as as non-substantive, the Company believes updating its tariff is a worthwhile endeavor as a good Tariff can serve as a cornerstone resources guiding internal compliance as well as informing customers of terms and conditions.

As mentioned, this housekeeping filing accomplishes the following:

- 1) Modernizes the formatting;
- Ensures the Tariff content meets the requirements of the Washington Administrative Code (WAC);
- 3) Revises the language for greater clarity; and
- 4) Removes elements that are no longer valid or necessary.

¹ Commission Staff's Motion to Reject Filing filed in UG 170855 states, "The Company has included an overwhelming amount of non-substantive revisions, on nearly every page, of the Company's tariff. These changes are better left out of a company's request for a rate increase because they comingle and clutter the changes that are relevant for the requested rate increase. Cascade should be instructed to make such non-general rate case related changes in a separate proceeding.

The general look of each sheet is updated. The font is revised, and content is no longer in multiple text boxes for a cleaner presentation.

The other changes unrelated to formatting are described in the table below:

Title	Sheet(s)	- Description of changes
Title Page	Sheet No. 1	 In compliance with WAC 480-80-102(f), a complete name, address, phone number, unified business identifier, the mailing address and web address are added to the Title Page (Sheet No. 1).
N/A	4	 In compliance with WAC 480-80-102(3), a Legend of Symbols defining margin codes is added as Sheet No. 4.
Rule 1, General	Sheet No.	 The Company's webpage is provided as a way to access Cascade's tariff. The heating value of gas is removed from Rule 16 and added to Rule 1. This information is provided in compliance with WAC 480-90-303 and WAC 480-80-102(4)(b)(ii). Also added is a general statement that service is subject to the availability of adequate capacity and gas supply, as applicable. This statement currently is included in the Availability section of the rate schedules. The Company plans to remove the language from the rate schedules when it files its next housekeeping filing. The repetition is unnecessary.
Rule 2, Definitions	Sheet Nos. 6 through 6-B	 The list of defined terms is expanded and the definitions are re-worded for greater clarification. Defined terms that are not used in the tariff are removed.
Rule 3, Applications and Contracts for Service	Sheet No. 7	 Rule 3, Applications and Contracts for Service is retitled Rule 3, Establishing Service, and is revised to include a list of acceptable forms of identification as required per WAC 480-90-108(2)(d).
Rule 4, Customer Deposits	Sheet No. 8 through 8-B	 The title of the rule is revised to include other forms of security such as a surety agreement or a letter of irrevocable credit. Rule 4 currently cites WAC 480-90-113 and WAC 480-90-118 as its policy without further elucidation. Language is added so the rule explains the Company's terms and conditions without requiring the reader to consult the WAC.
Rule 5, Notification of and Discontinuance of Service	Sheet Nos. 9 through 9-B	 The title is revised to clarify that the rule addresses disconnection and reconnection of service. Additional language is added to explain notifications for disconnection of service, the field visit charge, and medical certificates.

Title	Sheet(s)	- Description of changes
Rule 6, Billing	Sheet Nos. 10 through 10-C	 The title of rule 6 is changed from Billing to Billings and Payments as this new title is a more accurate summary of the content. The rule is reorganized and additional information is provided on priority of payment, estimated bills, tampering and unauthorized use, and the late payment charge.
Rule 7, Meters and Meter Test Procedures	Sheet Nos. 11 through 11-A	 Minor wording revisions are made and language is added for clarification.
Rule 8, Extensions of Distribution Facilities	Sheet Nos. 12 through 12-B	 The Company removes "pre-tax" from statements saying a customer's allowance is their annual distribution margin divided by the Company's approved "pre-tax" authorized rate of return. The inclusion of "pre-tax" was an error. Language is added to clarify that when the Company finances a nonresidential customer's line extension costs, the charge will be a flat monthly fee for an agreed upon term. The Company historically has offered some way for large projects to pay the non-economic line extension costs over time but nothing has been established in the tariff. By adding this language, the offering is transparent and should be applied consistently to all applicable customers.
Rule 10, House Piping	Sheet No. 14	 The language in Rule 10 is consolidated with the language found in the Rule 11. Both rules address the customer's responsibility to install, own, and maintain all facilities behind the Company's meter. The title of the Rule is revised from House Piping to Customer-Owned Facilities.
Rule 11, Responsibility for Maintenance of Service Connections	Sheet No. 15	 Rule 11, Responsibility for Maintenance of Service Connections is removed because the relevant language from this rule is added to Rule, 10, Housepiping.
Rule 12, Temporary Service	Sheet No. 16	 Rule 12, Temporary Service is removed because the Company has not actively offered temporary service for some time.
Rule 13, Company Responsibility	Sheet No. 17	- Minor wording changes are made for greater clarity.
Rule 14, Customer's Liability	Sheet No. 18	- Minor wording changes are made for greater clarity.
Rule 15, Force Majeure	Sheet No. 19	 A paragraph at the bottom of the policy stating customer does not have to pay all charges when the customer is unable to operate its equipment is removed as this language could be misunderstood and any negotiations of this nature should be addressed on a case-by-case basis.

Title	Sheet(s)	-	Description of changes
Rule 16, Heating	Sheet No.	-	Rule 16 is removed because the information found in the
Value	20		current Rule 16 is moved into Rule 1.
Rule 17, Firm Service Priority	Sheet Nos. 21 through 21-A	-	Rule 17, Firm Service Priority is renamed Order of Priority for Gas Service. The name change corresponds with an increased scope for the rule. The language is revised to address curtailments as they apply to all customers and the penalties a customer must pay for the use of unauthorized gas during curtailment periods. Language is added that allows the Company the discretion to charge a fee for the unauthorized use of gas during a curtailment. The fee equal to the higher of \$1 a therm or 150% of the highest midpoint price for the day is commensurate with an emergency situation. This is the same as the unauthorized usage charge in Rule 20 Language specific to entitlements is removed as it is only applicable to transportation customers (non-firm service customers) served on Schedule 663 and the language is also found in Rule 20, Unbundled Distribution System Transportation Service Rules, which is a more appropriate place for it.
Rule 18, Limitation of	Sheet No.	-	Minor wording changes are made for greater clarity.
Service to Applicants	Chart Nas		NA:
Rule 19, Purchase Gas Cost Adjustment	Sheet Nos. 23	-	Minor, non-substantive language changes are made.
Mechanism	through 23-A		
Schedule 300,	Sheet Nos.	-	The General Provisions are reformatted into 2 sections:
Residential	300		Program Cost Recovery and Program Specifications.
Conservation	through		- · ·
Incentive Program	300-A		
Schedule 301, Low	Sheet No.	-	A few typos are corrected.
Income	301		
Weatherization	through		
Incentive Program	301-A		
Schedule 302,	Sheet Nos.	-	This schedule is reformatted.
Commercial/Industrial	302		
Conservation Program	through		
	302-B		
Schedule 303,	Sheet Nos.	-	This schedule is reformatted.
Washington Energy	303		
Assistance Fund	through		
(WEAF) Program	303.B		

Title	Sheet(s)	- Description of changes
Schedule 500, Tax Schedule	Sheet Nos. 500 through 500-C	 This schedule is reformatted into a table for increased readability. Only the most currently adopted ordinance is included in the Schedule. The cap for the City of Elma tax is removed.
Schedule 590, Low Flow Showerhead Program	Sheet No. 590	 This schedule is removed because the Company does not have a low flow showerhead program. The Company's conservation plan is detailed in Schedules 300, 301, and 302, as well as the Company's annually filed Conservation Plan.
Schedule 598, General Revision of Rate Schedule Charges	Sheet No. 598	- This adjustment schedule is removed as it is no longer in use.
Schedule 685, Optional Firm Pipeline Capacity	Sheet Nos. 685 through 685-A	 This Schedule is withdrawn because the Company no longer offers competitive, upstream services to transportation customers.
Schedule 686, Optional Interruptible Pipeline Capacity Supplemental Schedule	Sheet No. 686	 This Schedule is withdrawn because the Company no longer offers competitive, upstream services to transportation customers.
Schedule 687, Optional Gas Management Services	Sheet No. 687	 This Schedule is withdrawn because the Company no longer offers competitive, upstream services to transportation customers.
Schedule 690, Buy- Sell Supply Service	Sheet No. 690	 This Schedule is withdrawn because the Company no longer offers competitive, upstream services to transportation customers.
Schedule 700, Optional Customer- Owned Piping Construction, Operation, & Maintenance	Sheet No. 700	 This Schedule is withdrawn because the Company no longer offers behind the meter services. The Company no longer offers this service as it does not hold a current construction license which is required for such work.

File Names

Below is a list of the names of all files comprising this filing:

- NEW, CNG Advice No. W17-12-01, CLtr, 12.1.17.pdf The Cover Letter
- The proposed tariff sheets are provided as the following files:
 - o NEW, CNG Advice No. W17-12-01, 0 Title Sheet, 12.1.17.pdf
 - o NEW, CNG Advice No. W17-12-01, 4 Legend of Symbols, 12.1.17.pdf

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NEW, CNG Advice No. W17-12-01, 5 - Rule 1, 12.1.17.pdf
   NEW, CNG Advice No. W17-12-01, 6 - Rule 2, 12.1.17.pdf
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   NEW, CNG Advice No. W17-12-01, 6-A - Rule 2, 12.1.17.pdf
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   NEW, CNG Advice No. W17-12-01, 6-B - Rule 2, 12.1.17.pdf
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   NEW, CNG Advice No. W17-12-01, 7 - Rule 3, 12.1.17.pdf
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   NEW, CNG Advice No. W17-12-01, 8 – Rule 4, 12.1.17.pdf
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   NEW, CNG Advice No. W17-12-01, 8-A - Rule 4, 12.1.17.pdf
   NEW, CNG Advice No. W17-12-01, 8-B - Rule 4, 12.1.17.pdf
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   NEW, CNG Advice No. W17-12-01, 9-A - Rule 5, 12.1.17.pdf
   NEW, CNG Advice No. W17-12-01, 9-B - Rule 5, 12.1.17.pdf
   NEW, CNG Advice No. W17-12-01, 10 - Rule 6, 12.1.17.pdf
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NEW, CNG Advice No. W17-12-01, Leg Tariffs, 12.1.17.pdf – The legislative tariff sheets

If you have any questions, please call Jennifer Gross at (509)734-4635.

Sincerely,

/s/ Michael Parvinen

Michael Parvinen
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W Grandridge Blvd
Kennewick, WA 99336-7166
michael.parvinen@cngc.com

Attachments