



8113 W. GRANDRIDGE BLVD., KENNEWICK, WASHINGTON 99336-7166
TELEPHONE 509-734-4500 FACSIMILE 509-737-7166
www.cngc.com

VIA ELECTRONIC MAIL
records@utc.wa.gov

May 14, 2015

Records Center
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504

Re: U-144155 – Cascade Natural Gas’s Comments

Below are Cascade Natural Gas Corporation’s comments provided in response to the Washington Utilities and Transportation Commission’s (WUTC’s) Notice of Opportunity to Submit Written Comments, issued in Docket No. U-144155.

1. Please provide the average number of meters in service from 2012 to 2014.

Response

Cascade Natural Gas had an annual average of 205,909 meters during the 2012 through 2014 timeframe. The per annual meter count is provided in the table below:

Year	Number of Meters
2012	203,214
2013	206,107
2014	208,408

2. Please provide three years of historical data showing the following:

- a. Total number of retroactive bills and length of the retroactive bills for stopped meters.
- b. Total number of unidentified energy usage meters.

Response

Cascade Natural Gas does not track this information.

3. What is the company's policy regarding bill settlement for metering errors?

Response

When a metering error results in either an under- or over-billing, the Company's practice is to comply with WAC 480-90-183 which states the utility must "adjust the bills to the customer based on the best information available to determine the appropriate charges."

While the Company does not consider unidentified usage as a metering error, for the purpose of disclosure, the Company's practice for settling billing errors related to unidentified usage is established in Rule 6 of its Tariff:

In the case of tampering or unauthorized use, probable consumption will be billed as determined by the maximum quantity of gas estimated to have been consumed by the various appliances of customer and a bill will be rendered for a period encompassing six (6) months prior to the detection of such abuse and/or disconnection for cause.

4. Does the company have a billing threshold before investigating zero-read meter readings or unidentified energy usage? If so, please provide information on the company's minimum billing threshold.

Response

Yes, a report listing abnormally high or low reads is automatically generated when a read is 90% lower or higher than the expected bandwidth of normal usage. Expected usage is 0.4 to 2.5 times estimated usage based on the demand at the premise for the prior three years. The reporting on low reads should alert the Company to most dead meters; however, a zero read is not always abnormal depending on whether or not the usage at the site is seasonal.

The report also alerts the Company when a meter with no customer of record registers any usage above zero. When unidentified energy usage is discovered, the Company places a door hanger on the premise asking the occupant to establish service within 48 hours. If service is not established within that timeframe, the service is disconnected.

- 5. Does the company have specific goals regarding the identification and resolution of stopped meters and unidentified energy usage meters?**

Response

No. The Company has no specific goal for identifying and resolving stopped meters and unidentified energy usage meters, and believes goals are unnecessary since the Company manages the issue in a reasonable manner by investigating meter read anomalies on daily basis, complying with meter testing requirements, and responding to customer inquiries on billings.

- 6. What types of reports does the company generate to help identify stopped meter and unidentified usage meter problems?**

Response

A daily report of high and low reads is automatically generated in the Company's billing system. As described in response to question number 4, a high or low bill is one that is 90% outside the range of normal which is 0.4 to 2.5 times expected use based on the prior on three years of historic usage.

Billing personnel manually review the report and determine if a bill should be issued in accordance with the meter read or if a service request for a meter check is necessary. Based on the findings of a meter check, field personnel will either validate the accuracy of the meter and the bill will be issued, or the meter will be replaced. If the meter is replaced, an estimated bill is issued using the usage patterns for the same timeframe for the prior three years.

If you have any questions regarding this report, please contact me at (509) 734-4593.

Sincerely,



Michael Parvinen
Director, Regulatory Affairs