

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS
CORPORATION

Respondent.

Docket No. UG-152286

CASCADE NATURAL GAS
CORPORATION'S MOTION TO
FILE SUPPLEMENTAL
TESTIMONY

I. RELIEF REQUESTED

1 In accordance with WAC 480-07-375(1)(d) and WAC 480-07-460(1)(b)(ii), Cascade Natural Gas Corporation (Cascade or Company), moves the Washington Utilities and Transportation Commission (Commission) for an order authorizing Cascade to file supplemental testimony. Cascade seeks to update its initial filing, as provided in WAC 480-07-460(1)(b)(ii), with the proposed supplemental testimony identified as Exhibit No. __ (MPP-6T), which accompanies this motion.

2 The Company's proposed supplemental testimony is provided in response to a request by Commission Staff that Cascade provide testimony regarding late payment billing practices and disconnection visit charges; the request is related to the settlement agreement in docket UG-140381.¹ By requesting leave to file this supplemental testimony, Cascade seeks to fulfill the terms of the settlement agreement and be responsive to Staff's request for additional testimony.

¹ See *Wash. Utils. & Transp. Comm'n v. Cascade Natural Gas Corp.*, Docket UG-140381, Order 03 at App. A, ¶¶ 10, 17 (June 10, 2015).

3 The supplemental testimony will ensure that the Commission has the best available evidence upon which to decide the issues in this case. Because the supplemental testimony “includes substantive changes other than to simply correct errors of fact asserted by a witness” Cascade must “seek leave from the presiding officer by written motion . . . to submit testimony.”²

4 When deciding whether to grant a motion to file supplemental testimony, the Commission observed that its “paramount interest is in having a full record with the best available evidence upon which to base its decisions.”³ Thus, when a party “offers supplemental evidence, as here, the Commission balances its interest in having up-to-date information against the needs of the parties to have adequate opportunities for discovery and the development of their own testimony and exhibits.”⁴

5 Here, the Company’s supplemental testimony describes its current late payment billing practices and disconnection visit charges, in compliance with the settlement in docket UG-140381 and in response to Commission Staff’s request for additional testimony. Therefore, to have a full and complete record and the best evidence upon which the Commission can analyze the Cascade’s rate request and current practices, the Company’s motion should be granted.

² WAC 480-07-460(1)(b)(ii).

³ *Wash. Utils. & Transp. Comm’n v. Puget Sound Energy, Inc.*, Docket UE-072300, Order 08 ¶ 10 (May 5, 2008); *see also Wash. Utils. & Transp. Comm’n v. Avista Corp.*, Docket UE-080416, Order 04 (Aug. 8, 2008) (applying the same balancing test); *Wash. Utils. & Transp. Comm’n v. Puget Sound Energy, Inc.*, Docket UE-111048, Order 07 (Jan. 27, 2012) (granting motion to supplement record to include recently identified customer “given the importance of a full and complete record”); *Re Verizon Communications Inc. and Frontier Communications Corp.*, Docket UT-090842, Order 03 (Aug. 18, 2003) (“The supplemental testimony and exhibits filed with Verizon and Frontier’s motion promote the Commission’s interest in having a full record on which to base its decision.”).

⁴ *Id.*

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Moreover, the Company's filing will not prejudice other parties. The Company's supplemental testimony is being filed while parties still have 68 days until the May 4, 2016 deadline to develop response testimony. The supplemental testimony addresses only two discrete issues and is just a few pages long. Because this request comes during the early stages of this case, parties will have a sufficient opportunity to conduct discovery and develop response testimony related to this supplemental testimony.

III. CONCLUSION

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For the reasons set forth above, Cascade respectfully requests that the Commission grant Cascade's motion to allow the filing of the Company's supplemental testimony, Exhibit No. __ (MPP-6T).

Respectfully submitted this 26th day of February, 2016.

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