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September 9, 2019

Mr. Mark Johnson, Executive Director & Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

RE: Cascade Natural Gas Corporation's 2019 Hedging Plan

Received
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09/09/19 11:30
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

On April 29th, 2019, the Commission acknowledged the receipt of Cascade’s 2018 Hedging Plan (UG-180825) and noted the Company presented a concrete plan for developing a risk-responsive hedging strategy and associated analytical capacities that it intends to deploy during the 2019-2020 PGA year.

Cascade expects its 2019 hedging plan to communicate the Company’s plans for deploying risk-responsive hedging protocols during the 2019-2020 PGA year. Cascade seeks to extend the 2019 Hedging Plan filing date from September 9th to September 11th, 2019. The Company makes this request for several reasons:

New information regarding potential measures to move gas from AECO has come to light. Cascade will want to incorporate this into the Hedging Plan, including potential impacts on pricing. The Company expects to receive additional material from its consultant, Gelber & Associates. Cascade will want to include this information to provide a more transparent and clearer picture of its process for the 2019-2020 PGA year.

The 2019 Hedging plan will be filed before the Company’s PGA filing, which complies with paragraph 51 of the UG-132019 Hedging Policy Statement: “Therefore, by the deadline for submitting 2019 PGA filings, barring extraordinary circumstances, the Companies should file annual hedging plans that exhibit a full strategy implementation for 2020 and beyond.”

If there are any questions regarding this matter, please contact me at (509) 734-4589 or via email at mark.sellers-vaughn@cngc.com.

Sincerely,
CASCADe NATURAL GAS CORPORATION

Mark Sellers-Vaughn
Manager, Supply Resource Planning