BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	DOCKET UG-200568
Complainant,	
v.	
CASCADE NATURAL GAS CORPORATION,	
Respondent.	

EXHIBIT TO
TESTIMONY OF

Aimee N. Higby

STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Cascade Response to UTC Staff Data Request No. 88

November 19, 2020

Washington Utilities and Transportation Commission
v.
Cascade Natural Gas Corporation
UTC STAFF Data Request
UG-200568

Request No. 88

Date prepared: 9/2/2020

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UTC STAFF DATA REQUEST NO. 88:

Re: Weather Normalization

The Joint Settlement Agreement in Docket UG-152286 provides that the Company shall
"use an alternative way of reporting monthly usage if unbilled therms are not trued up
monthly: align heating degree days with billing cycles on a monthly basis, rather than
using monthly usage data that includes gross estimates of unbilled therms." (UG-152286
Order 04, Exhibit A, paragraph 44, subsection (f)).

Please describe whether and how the Company complies with this settlement term
regarding monthly usage data as provided in Exh. BLR-2.

Response:

> Cascade's unbilled therm process is trued up annually in the month of August.
> Cascade attempted to align heating degree days with billing cycles in the 2017
> GRC, UG-170929, where pipeline data was used to align heating degree days
> with actual daily usage. This methodology also required an allocation using
> shifted billing cycles to allocate the pipeline usage data to the appropriate rate
> schedules. Staff expressed concern with this methodology, so Cascade and the
> UTC agree to continue using the agreed weather normalization methodology.
> Outside of a load study, Cascade does not believe there is a better way to align
> HDDs with actual usage than the existing unbilled adjustment.