

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION

COMMISSION

Docket Nos. UE-060256

WUTC v. CASCADE

PUBLIC COUNSEL SUPPLEMENTAL

TO STAFF DATA REQUESTS

Request No: 36
Directed to: Judith Krebs
Date Received: August 21, 2006
Date Produced: September 6, 2006
Prepared by: Jim Lazar
Witnesses: Jim Lazar

WUTC STAFF DATA REQUEST NO. 36

Re: Witness Jim Lazar

Referring to page 32, line 1 of Mr. Lazar's direct testimony, please provide Cascade's total number of residential heating customers. Also, please provide the total number of "bare essentials" customers.

RESPONSE:

Mr. Lazar does not have this data. This request should be put to Cascade.

The "bare essentials" usage Mr. Lazar refers to is usage for non-heating purposes. The WUTC specifically found that space heating is not an 'essential use' in Cause U-78-05. The proposed rate design is based on load factor of different end-uses, with load that occurs nearly every month and therefore has a high annual load factor being defined as "bare essentials" for the purpose of this rate design testimony.

Another reasonable definition of "bare essentials" that was not tied to load factor might reasonably include a significant amount of space heating energy

The California baseline inverted rates are an example of this, with separate summer and winter baselines, with each designed to provide a "bare essentials" level of service for each season, including modest amounts of space heating consumption.

The California rate designs for natural gas apply to approximately 10 million natural gas consumers, while there are only about 1 million gas consumers in Washington, and about

600,000 in Oregon. It is a safe statement that the vast majority of natural gas customers in the Western United States have inverted rates. See WUTC-36 Oregon, and WUTC-36 California attached. A supplemental response with the attachment WUTC-36 Washington will be provided shortly.

Supplemental:

A copy of WUTC-36 Washington is attached.





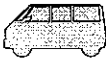



Washington		— Natural Gas 2004			
	Million Cu. Feet	Percent of National Total		Million Cu. Feet	Percent of National Total
					
 Total Net Movements:	316,411	—	 Industrial:	67,812	0.94
 Dry Production:	0	0.00	 Vehicle Fuel:	395	1.93
Deliveries to Consumers:			 Electric Power:	66,068	1.21
 Residential:	70,932	1.45			
 Commercial:	48,455	1.54	Total Delivered:	253,663	1.22

Table 73. Summary Statistics for Natural Gas – Washington, 2000-2004

	2000	2001	2002	2003	2004
Number of Gas and Gas Condensate Wells					
Producing at End of Year	0	0	0	0	0
Production (million cubic feet)					
Gross Withdrawals					
From Gas Wells	0	0	0	0	0
From Oil Wells	0	0	0	0	0
Total	0	0	0	0	0
Repressuring	0	0	0	0	0
Vented and Flared	0	0	0	0	0
Wet After Lease Separation	0	0	0	0	0
Nonhydrocarbon Gases Removed	0	0	0	0	0
Marketed Production	0	0	0	0	0
Extraction Loss	0	0	0	0	0
Total Dry Production	0	0	0	0	0
Supply (million cubic feet)					
Dry Production	0	0	0	0	0
Receipts at U.S. Borders					
Imports	347,992	366,050	394,929	366,257	339,051
Intransit Receipts	0	0	0	0	0
Interstate Receipts	831,267	804,179	732,652	643,275	693,781
Withdrawals from Storage					
Underground Storage	26,356	22,355	25,016	24,621	19,837
LNG Storage	1,178	2,126	1,076	3,071	2,565
Supplemental Gas Supplies	0	0	0	0	0
Balancing Item	-52,817	-10,612	-87,871	^R -82,237	-51,505
Total Supply	1,153,975	1,184,098	1,065,802	^R 954,987	1,003,728

See footnotes at end of table.

Table 73. Summary Statistics for Natural Gas - Washington, 2000-2004 - Continued

	2000	2001	2002	2003	2004
Disposition (million cubic feet)					
Consumption.....	286,653	312,114	233,716	^R 249,599	262,485
Deliveries at U.S. Borders					
Exports.....	0	1,529	1,477	33	15
Intransit Deliveries.....	0	0	0	0	1,528
Interstate Deliveries.....	841,630	843,241	804,137	675,930	714,879
Additions to Storage					
Underground Storage.....	24,424	25,176	25,378	26,357	22,194
LNG Storage.....	1,268	2,039	1,094	3,067	2,628
Total Disposition.....	1,153,975	1,184,098	1,065,802	^R954,987	1,003,728
Consumption (million cubic feet)					
Lease Fuel.....	0	0	0	0	0
Pipeline and Distribution Use.....	6,036	9,053	6,356	6,527	8,822
Plant Fuel.....	0	0	0	0	0
Delivered to Consumers					
Residential.....	71,779	84,416	73,347	71,110	70,932
Commercial.....	50,462	57,160	46,455	47,845	48,455
Industrial.....	83,748	75,017	67,717	65,884	67,812
Vehicle Fuel.....	228	283	288	^R 352	395
Electric Power.....	74,400	86,184	39,552	57,880	66,068
Total Delivered to Consumers.....	280,617	303,060	227,360	^R243,072	253,663
Total Consumption.....	286,653	312,114	233,716	^R249,599	262,485
Delivered for the Account of Others (million cubic feet)					
Residential.....	0	0	0	0	0
Commercial.....	3,691	3,439	4,739	5,722	5,557
Industrial.....	54,819	46,392	49,129	52,618	56,107
Number of Consumers					
Residential.....	813,319	841,617	861,943	895,800	926,510
Commercial.....	83,189	84,628	85,286	^R 87,082	93,559
Industrial.....	4,007	3,898	3,928	3,775	3,992
Average Annual Consumption per (thousand cubic feet)					
Commercial.....	607	675	545	549	518
Industrial.....	20,900	19,245	17,240	17,453	16,987
Average Price for Natural Gas (dollars per thousand cubic feet)					
Wellhead (Marketed Production).....	--	--	--	--	--
Imports.....	4.28	4.76	3.01	4.76	5.31
Exports.....	--	4.44	2.59	^R 4.35	4.16
Pipeline and Distribution Use.....	3.07	2.82	--	--	--
City Gate.....	4.16	5.31	3.83	5.13	6.15
Delivered to Consumers					
Residential.....	7.16	9.79	9.33	8.43	9.91
Commercial.....	6.02	8.62	8.24	7.38	9.40
Industrial.....	4.01	5.02	4.81	6.05	7.83
Vehicle Fuel.....	3.95	4.03	3.98	3.70	3.85
Electric Power.....	--	4.03	3.25	4.17	4.63

-- Not applicable.

^R Revised data.

Note: Totals may not add due to independent rounding.

Sources: Energy Information Administration (EIA), Form EIA-176, "Annual Report of Natural and Supplemental Gas Supply and Disposition"; Form EIA-895, "Monthly and Annual Quantity and Value of Natural Gas Production Report"; Form EIA-857, "Monthly Report of Natural Gas Purchases and Deliveries to Consumers"; Form EIA-816, "Monthly Natural Gas Liquids Report"; Form EIA-64A, "Annual Report of the

Origin of Natural Gas Liquids Production"; Form FERC-423, "Monthly Report of Cost and Quality of Fuels for Electric Plants"; Form EIA-423, "Monthly Cost and Quality of Fuels for Electric Plants Report"; Form EIA-191, "Monthly and Annual Underground Gas Storage Report"; Office of Fossil Energy, U.S. Department of Energy, *Natural Gas Imports and Exports*; the U.S. Minerals Management Service; Form EIA-906, "Power Plant Report"; Form EIA-886, "Annual Survey of Alternative Fueled Vehicle Suppliers and Users"; and EIA estimates.

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

Docket Nos. UE-060256

WUTC v. CASCADE

**RESPONSE OF PUBLIC COUNSEL TO STAFF
DATA REQUESTS**

Request No: 36
Directed to: Judith Krebs
Date Received: August 21, 2006
Date Produced: September 6, 2006
Prepared by: Jim Lazar
Witnesses: Jim Lazar

WUTC STAFF DATA REQUEST NO. 36

Re: Witness Jim Lazar

Referring to page 32, line 1 of Mr. Lazar's direct testimony, please provide Cascade's total number of residential heating customers. Also, please provide the total number of "bare essentials" customers.

RESPONSE:

Mr. Lazar does not have this data. This request should be put to Cascade.

The "bare essentials" usage Mr. Lazar refers to is usage for non-heating purposes. The WUTC specifically found that space heating is not an 'essential use' in Cause U-78-05. The proposed rate design is based on load factor of different end-uses, with load that occurs nearly every month and therefore has a high annual load factor being defined as "bare essentials" for the purpose of this rate design testimony.

Another reasonable definition of "bare essentials" that was not tied to load factor might reasonably include a significant amount of space heating energy

The California baseline inverted rates are an example of this, with separate summer and winter baselines, with each designed to provide a "bare essentials" level of service for each season, including modest amounts of space heating consumption.

The California rate designs for natural gas apply to approximately 10 million natural gas consumers, while there are only about 1 million gas consumers in Washington, and about 600,000 in Oregon. It is a safe statement that the vast majority of natural gas customers in the Western United States have inverted rates. See WUTC-36 Oregon, and WUTC-36

California attached. A supplemental response with the attachment WUTC-36
Washington will be provided shortly.

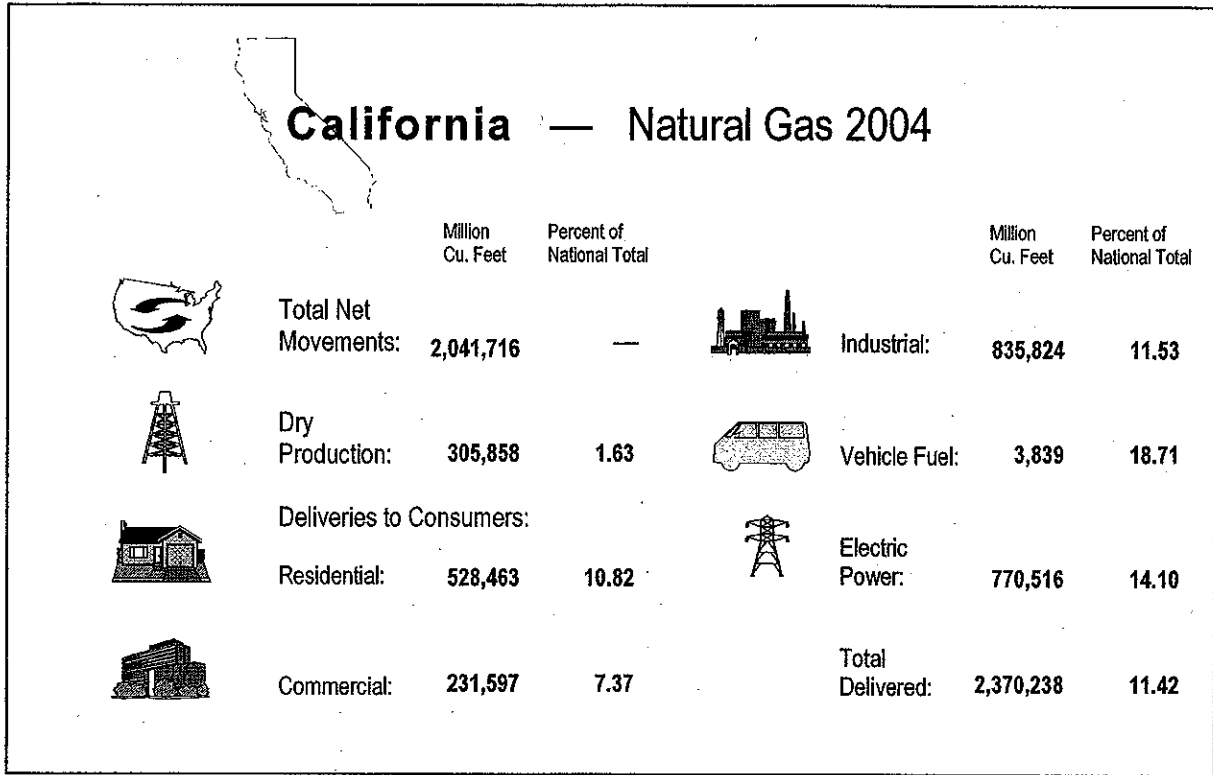


Table 30. Summary Statistics for Natural Gas – California, 2000-2004

	2000	2001	2002	2003	2004
Number of Gas and Gas Condensate Wells Producing at End of Year	1,169	1,244	1,232	1,249	1,272
Production (million cubic feet)					
Gross Withdrawals					
From Gas Wells.....	94,465	94,790	92,050	90,368	79,823
From Oil Wells.....	324,400	320,048	304,972	278,072	269,004
Total	418,865	414,838	397,021	368,440	348,827
Repressuring.....	39,812	35,052	30,991	23,806	22,405
Vented and Flared.....	2,210	1,717	2,690	3,940	3,215
Wet After Lease Separation.....	376,843	378,069	363,340	340,695	323,206
Nonhydrocarbon Gases Removed.....	263	246	3,136	3,478	3,287
Marketed Production.....	376,580	377,824	360,205	337,216	319,919
Extraction Loss.....	11,063	11,060	12,982	13,971	14,061
Total Dry Production	365,517	366,764	347,223	323,245	305,858
Supply (million cubic feet)					
Dry Production.....	365,517	366,764	347,223	323,245	305,858
Receipts at U.S. Borders					
Imports.....	0	0	0	0	0
Intransit Receipts.....	0	0	0	0	0
Interstate Receipts.....	1,928,462	2,165,838	1,955,339	1,981,415	2,145,937
Withdrawals from Storage					
Underground Storage.....	158,132	124,966	141,664	166,167	194,677
LNG Storage.....	36	60	37	42	36
Supplemental Gas Supplies.....	0	0	0	0	0
Balancing Item.....	205,054	42,464	8,107	47,844	92,064
Total Supply	2,657,201	2,700,092	2,452,369	2,518,712	2,738,573

See footnotes at end of table.

Table 30. Summary Statistics for Natural Gas - California, 2000-2004 - Continued

	2000	2001	2002	2003	2004
Disposition (million cubic feet)					
Consumption	2,508,797	2,464,565	2,273,193	^R 2,269,405	2,423,304
Deliveries at U.S. Borders					
Exports	13,152	23,320	35,305	^R 53,720	80,019
Intransit Deliveries	0	0	0	^R 7,137	0
Interstate Deliveries	24,809	22,507	19,189	21,532	24,203
Additions to Storage					
Underground Storage	110,172	189,640	124,641	166,879	211,010
LNG Storage	270	60	40	39	37
Total Disposition	2,657,201	2,700,092	2,452,369	^R2,518,712	2,738,573
Consumption (million cubic feet)					
Lease Fuel	60,757	49,766	41,878	39,452	37,337
Pipeline and Distribution Use	9,698	10,913	9,610	8,670	12,969
Plant Fuel	3,572	2,893	2,781	2,568	2,760
Delivered to Consumers					
Residential	516,730	512,695	510,995	^R 497,955	528,463
Commercial	246,439	245,795	238,308	^R 232,912	231,597
Industrial	776,202	666,462	740,195	^R 779,085	835,824
Vehicle Fuel	2,022	2,714	2,798	^R 3,419	3,839
Electric Power	893,377	973,327	726,627	705,343	770,516
Total Delivered to Consumers	2,434,770	2,400,993	2,218,924	^R2,218,715	2,370,238
Total Consumption	2,508,797	2,464,565	2,273,193	^R2,269,405	2,423,304
Delivered for the Account of Others (million cubic feet)					
Residential	4,783	3,298	3,271	^R 8,564	18,419
Commercial	105,650	92,011	74,767	^R 69,072	66,778
Industrial	708,289	606,097	682,886	^R 740,589	791,981
Number of Consumers					
Residential	9,370,797	9,603,122	9,726,642	^R 9,803,311	9,957,417
Commercial	413,003	416,036	420,690	^R 431,795	432,367
Industrial	35,391	34,893	33,725	^R 34,617	41,487
Average Annual Consumption per (thousand cubic feet)					
Commercial	597	591	566	^R 539	536
Industrial	21,932	19,100	21,948	^R 22,506	20,147
Average Price for Natural Gas (dollars per thousand cubic feet)					
Wellhead (Marketed Production)	4.81	6.93	2.92	5.04	5.65
Imports	-	-	-	-	-
Exports	5.97	6.85	3.21	^R 5.25	5.78
Pipeline and Distribution Use	3.62	4.70	-	-	-
City Gate	4.32	6.64	3.20	5.16	6.04
Delivered to Consumers					
Residential	8.21	10.43	7.11	9.13	9.86
Commercial	7.54	9.33	6.07	8.15	8.63
Industrial	5.29	6.60	4.93	7.19	7.89
Vehicle Fuel	5.92	6.51	4.35	5.76	6.97
Electric Power	5.88	9.38	3.82	^R 5.50	6.05

- Not applicable.

^R Revised data.

Note: Totals may not add due to independent rounding.

Sources: Energy Information Administration (EIA), Form EIA-176, "Annual Report of Natural and Supplemental Gas Supply and Disposition"; Form EIA-895, "Monthly and Annual Quantity and Value of Natural Gas Production Report"; Form EIA-857, "Monthly Report of Natural Gas Purchases and Deliveries to Consumers"; Form EIA-816, "Monthly Natural Gas Liquids Report"; Form EIA-64A, "Annual Report of the

Origin of Natural Gas Liquids Production"; Form FERC-423, "Monthly Report of Cost and Quality of Fuels for Electric Plants"; Form EIA-423, "Monthly Cost and Quality of Fuels for Electric Plants Report"; Form EIA-191, "Monthly and Annual Underground Gas Storage Report"; Office of Fossil Energy, U.S. Department of Energy, *Natural Gas Imports and Exports*; the U.S. Minerals Management Service; Form EIA-906, "Power Plant Report"; Form EIA-886, "Annual Survey of Alternative Fueled Vehicle Suppliers and Users"; and EIA estimates.









		Million Cu. Feet	Percent of National Total			Million Cu. Feet	Percent of National Total
		Oregon — Natural Gas 2004					
	Total Net Movements:	229,826	—		Industrial:	71,687	0.99
	Dry Production:	467	0.00		Vehicle Fuel:	96	0.47
Deliveries to Consumers:					Electric Power:	88,734	1.62
	Residential:	38,532	0.79				
	Commercial:	26,214	0.83	Total Delivered:		225,263	1.09

Table 63. Summary Statistics for Natural Gas – Oregon, 2000-2004

	2000	2001	2002	2003	2004
Number of Gas and Gas Condensate Wells					
Producing at End of Year	17	20	18	15	15
Production (million cubic feet)					
Gross Withdrawals					
From Gas Wells	1,412	1,112	837	731	467
From Oil Wells	0	0	0	0	0
Total	1,412	1,112	837	731	467
Repressuring	0	0	0	0	0
Vented and Flared	0	0	0	0	0
Wet After Lease Separation	1,412	1,112	837	731	467
Nonhydrocarbon Gases Removed	198	3	0	0	0
Marketed Production	1,214	1,110	837	731	467
Extraction Loss	0	0	0	0	0
Total Dry Production	1,214	1,110	837	731	467
Supply (million cubic feet)					
Dry Production	1,214	1,110	837	731	467
Receipts at U.S. Borders					
Imports	0	0	0	0	0
Intransit Receipts	0	0	0	0	0
Interstate Receipts	887,461	901,982	885,998	729,747	822,681
Withdrawals from Storage					
Underground Storage	9,104	7,868	13,894	10,980	8,394
LNG Storage	789	1,215	664	992	1,190
Supplemental Gas Supplies	2	2	5	5	5
Balancing Item	14,664	9,577	-21,951	^R 18,048	5,408
Total Supply	913,235	921,754	879,448	^R760,502	838,146

See footnotes at end of table.

Table 63. Summary Statistics for Natural Gas - Oregon, 2000-2004 - Continued

	2000	2001	2002	2003	2004
Disposition (million cubic feet)					
Consumption	224,888	229,665	202,164	^R 212,556	234,997
Deliveries at U.S. Borders					
Exports	0	0	0	0	0
Intransit Deliveries	0	0	0	0	0
Interstate Deliveries	678,458	680,368	659,944	536,776	592,855
Additions to Storage					
Underground Storage	8,892	10,487	16,746	10,194	9,101
LNG Storage	997	1,234	594	977	1,193
Total Disposition	913,235	921,754	879,448	^R760,502	838,146
Consumption (million cubic feet)					
Lease Fuel	49	42	40	^R 43	27
Pipeline and Distribution Use	11,775	10,990	9,117	7,098	9,707
Plant Fuel	0	0	0	0	0
Delivered to Consumers					
Residential	38,698	38,271	38,858	37,300	38,532
Commercial	28,589	27,884	27,714	26,110	26,214
Industrial	76,273	69,866	70,510	^R 67,519	71,687
Vehicle Fuel	52	69	70	86	96
Electric Power	69,451	82,542	55,854	74,400	88,734
Total Delivered to Consumers	213,063	218,632	193,006	^R205,415	225,263
Total Consumption	224,888	229,665	202,164	^R212,556	234,997
Delivered for the Account of Others (million cubic feet)					
Residential	0	0	0	0	0
Commercial	336	201	366	428	372
Industrial	62,767	54,858	60,323	^R 55,670	53,860
Number of Consumers					
Residential	523,952	542,799	563,744	625,398	595,495
Commercial	66,893	68,098	69,150	74,515	71,762
Industrial	717	821	842	^R 926	907
Average Annual Consumption per (thousand cubic feet)					
Commercial	427	409	401	350	365
Industrial	106,378	85,099	83,741	^R 72,915	79,037
Average Price for Natural Gas (dollars per thousand cubic feet)					
Wellhead (Marketed Production)	2.69	3.66	3.97	4.48	3.89
Imports	-	-	-	-	-
Exports	-	-	-	-	-
Pipeline and Distribution Use	2.74	2.91	-	-	-
City Gate	3.87	5.04	5.25	5.19	5.86
Delivered to Consumers					
Residential	8.12	9.70	10.54	9.84	11.11
Commercial	6.48	7.99	7.86	7.91	9.37
Industrial	4.93	6.09	6.98	5.84	6.30
Vehicle Fuel	7.85	5.10	6.95	7.70	0.99
Electric Power	2.94	3.82	3.39	^R 4.51	5.15

- Not applicable.

^R Revised data.

Note: Totals may not add due to independent rounding.

Sources: Energy Information Administration (EIA), Form EIA-176, "Annual Report of Natural and Supplemental Gas Supply and Disposition"; Form EIA-895, "Monthly and Annual Quantity and Value of Natural Gas Production Report"; Form EIA-857, "Monthly Report of Natural Gas Purchases and Deliveries to Consumers"; Form EIA-816, "Monthly Natural Gas Liquids Report"; Form EIA-64A, "Annual Report of the

Origin of Natural Gas Liquids Production"; Form FERC-423, "Monthly Report of Cost and Quality of Fuels for Electric Plants"; Form EIA-423, "Monthly Cost and Quality of Fuels for Electric Plants Report"; Form EIA-191, "Monthly and Annual Underground Gas Storage Report"; Office of Fossil Energy, U.S. Department of Energy, *Natural Gas Imports and Exports*; the U.S. Minerals Management Service; Form EIA-906, "Power Plant Report"; Form EIA-886, "Annual Survey of Alternative Fueled Vehicle Suppliers and Users"; and EIA estimates.