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February 5, 2014

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

RE: Cascade Natural Gas Corporation's 2014 Integrated Resource Plan Work Plan Extension -  
REVISED (Docket **UG-140181**)

Subsequent to recent discussions with Commission Staff, Cascade Natural Gas Corporation respectfully revises our request for an extension of the filing deadline for the upcoming Integrated Resource Plan (IRP). Cascade now seeks to extend the next IRP filing date from December 15, 2014 to March 15, 2015. The Company makes this request for several reasons:

Cascade's most recent Integrated Resource Plan was acknowledged by the Commission on August 8, 2013. As part of our continuing IRP process, the Company has been actively working to improve the demand forecasting and resource analysis. Some of these improvements are requiring significant analysis of our demand forecast and resource modeling methodologies.

The Company's most recently acknowledged Integrated Resource Plan's demand forecast and pipeline capacity needs were developed at the pipeline zonal level. Consequently, the analysis to determine potential peak day shortfalls was performed at the zonal level. The Company has used this analysis as part of its ongoing efforts to identify areas where pipeline capacity could be re-aligned or to pursue other means to meet the peak day demand such as acquiring incremental pipeline capacity. The Company believes that a more accurate picture of the capacity needs can be obtained if resource and demand forecast modeling and analysis are performed at a more detailed level than the zonal level. The Company feels developing the plan at the city gate level will significantly improve our planning and provide more transparency to stakeholders.

In order to accomplish this more robust demand forecast and capacity analysis the Company has undertaken a near total reconfiguration of the SENDOUT resource optimization model, which is a highly complex and time consuming process. By delaying the plan, we will be able to complete the configuration of the forecast and resource modeling at the city gate level. At the city gate level, the Company can perform more detailed analysis, allowing Cascade to better identify specific locales where shortfalls may exist. This more detailed analysis will better

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inform all stakeholders, allowing for a more robust discussion during the public process (technical advisory group meetings) on how best to address specific capacity needs and determine what alternative resources may be needed to meet long term demand. Lastly, this extension will allow for the IRP process to run concurrently with Oregon IRP process, which will allow all stakeholders in both jurisdictions equal opportunities to participate and provide advice to Cascade on the development of the Integrated Resource Plan.

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

Sincerely,  
CASCADE NATURAL GAS CORPORATION

A handwritten signature in black ink that reads "Mark Sellers-Vaughn". The signature is written in a cursive, flowing style.

Mark Sellers-Vaughn  
Manager, Supply Resource Planning