

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**Docket UG-210755
Cascade Natural Gas Corporation
2021 General Rate Case****AWEC DATA REQUEST NO. 118:****Settlement Stipulation**

Reference Chiles, Exh. MAC-4T at 16:12-17: Cascade states “[i]t appears Mr. Mullins’ calculations are incorrect.” Please provide Cascade’s alleged corrected calculations, including an updated version of the file “210755-JOINT Exh-JT-2-3-22-22” incorporating AWEC’s recommendation to eliminate Schedule 581 and include 2020 EDIT reversals in base rate revenue requirement.

Response:

Cascade Natural Gas Corporation objects to AWEC Data Request No. 118 as neither relevant to the issues in this adjudicated proceeding nor reasonably calculated to lead to the discovery of admissible evidence. The issues raised in AWEC Data Request No. 118 are addressed in Docket UG-220198 and are not at issue in this proceeding. Cascade further objects to AWEC Data Request No. 118 as purporting to impose obligations upon Cascade in excess of those required by the Washington Utilities and Transportation Commission's discovery rules (WAC 480-07-400 through 480-07-425) insofar that they request Cascade to perform calculations supporting evidence upon which Cascade does not rely. Notwithstanding the above-referenced objections, and subject thereto, Cascade responds as follows: please see Cascade’s initial filing, including cover letter and workpapers, supporting its tariff revisions in Docket UG-220198.