



Investigation Report

Cascade Natural Gas

UG-140381

Susie Paul
Compliance Investigations

October 2014

TABLE OF CONTENTS

PURPOSE, SCOPE AND AUTHORITY	3
EXECUTIVE SUMMARY	4
BACKGROUND	5
INVESTIGATION	6
Data Request	6
Late Payment Charges.....	7
Disconnect Fees	10
Statement Mailing and Payment Dates	14
Bellingham City Tax	15
Bellingham Late Payment Charges	17
Federally Recognized Indian Nation Tax Credit.....	18
SUMMARY OF RECOMMENDATIONS	19
APPENDICES	22
A: Consumer Complaint 117725	22
B: Data Request, dated July 25, 2013	23
C: Data Request, dated Sept. 9, 2013.....	25
D: Advice No. CNG/W13-06-01, First Revision Sheet No. 200	28
E: UG 060256 Settlement Agreement, page 8, listing late fees	29
F: Customer bill showing late payment charge after bill due date	30
G: Copy of Ninth Revision Sheet No. 9.....	31
H: Copy of Jan. 18, 2007, letter by UTC Executive Secretary Washburn and	35
I: Copy of CNG\W01-05-01, dated May 31, 2001.....	37
J: Email, dated Oct. 2, 2013, requesting bill statement and mailing dates	38
K: Batch report for billing statement postage, dated April 15, 2013.....	39
L: Billing statement, dated April 12, 2013.....	40
M: CNG Tariff, Tax Schedule No. 500 A, Tax Additions	41
N: Copy of Advice No. CNG\W13-01-01, dated Jan. 18, 2013.....	42
O: Bellingham customer's billing statement with city tax rate identified at 6.383 percent	43
P: Bellingham Tax Return with credit for overpayment	44
Q: CNG report of gross receipts and tax rate to City of Bellingham	45
R: Copy of Advice No. CNG/W14-03-01, dated March 31, 2014.....	46
S: Copy of Seventy-Fifth Revision Sheet No. 500.....	47
T: Emails, dated Oct. 8, 2013, re Bellingham tax error	48
U: Email, dated Feb. 5, 2014, regarding late payment charge	49
V: Copy of a customer's March billing statement with overcharge of a late payment fee.....	50
W: Copy of a customer's May billing statement with refund and corrected March late payment fee..	51
X: Tax Schedule No. 500 (B).....	52
Y: Customer billing statement with no state utility tax credit.....	53
Z: Customer billing statement with state utility tax credit	54

PURPOSE, SCOPE AND AUTHORITY

Purpose

The purpose of this investigation is to determine if Cascade Natural Gas Corporation (CNG) is in compliance with commission laws and rules.

Scope

The scope of this investigation includes CNG's general business practices as reflected in the data provided by CNG and in commission-referred consumer complaints.

Authority

Staff undertakes this investigation pursuant to Revised Code of Washington (RCW) 80.01.040, which directs the commission to regulate gas companies in the public interest. In addition, RCW 80.04.070 grants the commission the authority to conduct such an investigation.

Staff

Susie Paul, Compliance Investigator
(360) 664-1105
spaul@utc.wa.gov

EXECUTIVE SUMMARY

In commission-referred consumer complaint 117725, filed in June 2013, Consumer Protection staff found that CNG violated WAC 480-90-178(1)(b) when it incorrectly applied a late payment fee to a customer's billing statement. Staff decided a broader investigation was necessary to determine the frequency of incorrectly charged late payment fees.

An investigation into the business practices of CNG established that the company is in violation of commission rules, as follows:

- RCW 80.04.380, Violations by public service companies
- RCW 80.28.080, Published rates to be charged
- WAC 480-90-128, Disconnection of service
- WAC 480-90-178, Billing requirements and payment date
- WAC 480-90-195, Notice of tariff changes

Recommendation

Staff recommends the commission issue a formal complaint against CNG and:

1. Assess penalties of up to \$397,270 for the following violations:
 - Up to \$15,110 for 1,511 violations of RCW 80.28.080(1)(a) and WAC 480-90-178(1)(b).
 - Up to \$382,160 for 382,160 violations of RCW 80.28.080(1)(a) and WAC 480-90-178(1)(b).
2. Find the Company's disconnection visit fee tariff rate to be inconsistent with WAC 480-90-128(6)(k), unjust and unreasonable, require the Company to revise its tariff to be consistent with the intent of the law, and determine whether CNG should be required to refund customers disconnection visit charges assessed after the effective date of the complaint.

Staff recommends that CNG carefully review this report because it contains valuable technical assistance for the following violations:

- 4 violations of RCW 80.04.380 for untimely and incomplete responses to staff's data request.
- 1 violation of WAC 480-80-010(4) for failing to seek or receive authorization to deviate from tariff.
- 22,264 violations of WAC 480-90-178(1)(g) for issuing incorrect billing statements.
- 24,280 violations of WAC 480-90-178(2) for not allowing the required time between statement mailing and payment due dates.
- 22,264 violations of WAC 408-90-195(2) for not notifying customers of a change in charges.

A full discussion of staff's recommendation and the commission's enforcement policy appears at the end of this report.

BACKGROUND

Company Information

Cascade Natural Gas (CNG) serves more than 260,000 customers in Washington and Oregon. Cascade serves 68 communities in Washington, concentrated in the western and central regions of the state. The CNG Headquarters is located in Kennewick, Washington. CNG reported \$213,341,409 in revenue for Washington in the 2013 reporting period.

Consumer Complaint 117725

This investigation was prompted by commission-referred consumer complaint 117725.¹ In the complaint, CNG sent three separate notices dated April 30, 2013, to the same customer, but all three notices displayed different amounts due. Consumer Protection staff found CNG violated WAC 480-90-178(1)(b) by incorrectly applying late payment fees. The customer's position was upheld and received a credit. Consumer Protection staff forwarded the complaint to Compliance Investigations to determine whether CNG's practice of incorrectly applying late fee charges was widespread.

Compliance History

CNG has not been subject to any prior enforcement action related to its business practices. Below is a review of technical assistance provided to the company through commission-referred consumer complaints.

In consumer complaint 112749, filed with the commission in January 2012, a CNG customer reported that CNG had notified her by letter in November 2011 that she had been charged a Bellingham city tax in error. CNG's letter said that the customer would receive additional information and a credit on her next statement. The customer did not receive a credit or further information on her December billing statement. In January 2012, the customer contacted CNG and was told that she would receive a six-month credit for the incorrect charges.

Consumer Protection staff contacted CNG to investigate why the company only offered a six month refund, and to determine how many customers were affected by the error. In response to staff's inquiry, CNG reported that 498 customers had been affected, and that it is the company's policy to credit no more than six months for adjustment errors on city taxes. CNG stated the company had provided the affected customers a six-month credit for incorrect city tax charges. Consumer Protection staff recorded 498 violations of RCW 80.36.130 for charging customers who resided outside Bellingham city limits a Bellingham city tax.

RCW 80.04.240 requires a two-year refund of excessive charges. At the commission's direction through the consumer complaint, CNG was required to credit 498 customers an additional 18 months of incorrect city tax charges, for a total of 24 months for each affected customer. The total credit to customers was \$114,405.76.

¹ A copy of consumer complaint 117725 is attached as Appendix A.

INVESTIGATION

Data Request

In order to determine the extent and frequency of CNG's billing errors, on July 25, 2013, the commission sent CNG a data request requiring the following documents and information:²

1. A list of customers with account numbers, by month, in Washington state who were billed interest charges for late payments from July 1, 2011, through June 30, 2013.
2. The number of complaints, by month, the company received from Washington state customers related to late payment charges from July 1, 2011, through June 30, 2013.
3. The name, title, telephone number, and email address of the CNG contact person that our staff can work with directly for questions that may arise concerning any details of the data provided.

CNG staff identified Mike Parvinen, Director of Regulatory Affairs, as the contact person to work with commission staff concerning any details of the data provided.

The response was due to the commission no later than Aug. 16, 2013. On Aug. 16, CNG staff submitted an electronic response to the data request, but submitted only a small portion of the requested past due account information. On Aug. 19, the CNG contact emailed staff to explain that due to the size of the electronic files, they were sending the full response to the data request via FedEx. Staff received the response to the data request on Aug. 21, 2013. Staff finds CNG's response tardy and incomplete, and therefore in violation of RCW 80.04.380.

In the July 25, 2013, data request, staff requested CNG provide the number of complaints the company received related to late payment charges from July 1, 2011, to June 30, 2013. CNG responded that they received no complaints directly related to late payment fees, but did reference three complaints where late payment fees became part of the discussion. Included in the three complaints was commission-referred complaint 117725, which is the complaint that prompted this investigation.

On Sept. 9, staff requested CNG provide a list of residential customers in Washington who had their service disconnected for non-payment, as well as, copies of specific customer billing statements.³ Although the response was due by Sept. 23, 2013, staff granted a company request for an extension until Sept. 24.

Recommendation

Staff considers the four violations of RCW 80.04.380, for untimely and incomplete data request responses, as technical assistance. If future violations are found, staff may recommend penalties or take other enforcement action.

² A copy of the July 25, 2013 data request is attached as Appendix B.

³ A copy of the Sept. 9, 2013 data request is attached as Appendix C.

LATE PAYMENT CHARGES

RCW 80.28.080(1)(a) provides that no gas company may “charge, demand, collect or receive a greater or less or different compensation for any service rendered or to be rendered than the rates and charges applicable to such service as specified in its schedule filed and in effect at the time...”

Through the review of consumer complaint 117725 and this investigation, staff discovered that CNG’s application of late payment charges is in conflict with the company’s tariff because CNG applies late payment charges 16 days after the billing statement date, which is one day past the due date. On June 10, 2013, consumer complaint staff notified CNG by email of the discrepancy with the tariff, and noted that CNG’s Tariff WN U-3, Rule 6, specifically provides that the late payment charge will be applied for unpaid balances **30 days past due**:

CURRENT TARIFF

CNG WN U-3 Tenth Revision Sheet No. 10
Canceling Ninth Revision Sheet No. 10
Effective January 19, 2007

Rule 6 – Billing: A. General, states, “...Bills will be due and payable as of billing date and delinquent or past due fifteen (15) days thereafter. **Unless otherwise specified in the customer’s contract, a late payment charge at the rate of 1.0% per month will be applied to the customer’s current bill for all unpaid balances 30 days past due.**”

In addition, at the time Staff’s investigation was initiated, Original Sheet No. 200 of CNG’s tariff provided identical language related to late payment charges:

CNG WN U-3 Original Sheet No. 200
Effective January 19, 2007

Applicability: III. Late Payment Charge (Rule 6 – Part A) states, “...Unless otherwise specified in the customer’s contract, a late payment charge at the rate of 1.0% per month will be applied to the customer’s current bill for all unpaid balances 30 days past due.”⁴

On June 28, 2013, CNG submitted Advice No. CNG/W13-06-01 (Docket UG-131283) along with First Revision Sheet No. 200 Cancelling Original Sheet No. 200, with an effective date of July 29, 2013. The Company stated in the filing that the purpose of the filing was “to modify the text associated with the late payment charge.” The Company further stated, in part,

⁴ Both WN U-3 Tenth Revision Sheet No. 10 and Original Sheet No. 200 went into effect pursuant to Commission Order 05 in Docket UG-060256, a general rate case, which approved a settlement agreement filed by CNG and other parties.

“In 2011, the Company changed billing systems and the bills now show a due date instead of just the amount due. The Company still applies the Late Pay Fee as it has since approval of the tariff. Nothing has changed except providing a date on the bill which then creates confusion with the language on the tariff. The proposed filing realigns the tariffs with the billing system and maintains compliance with UG-060256.”⁵

The tariff revision went into effect by operation of law with no objection from staff on July 29, 2013, based on the Company’s representation that its practice had not changed. Below is the language for Substitute First Revision Sheet No. 200 which shows “30 days” has been removed from the text of this section of the tariff.

CURRENT

CNG WN U-3 Substitute First Revision Sheet No. 200

Canceling Original Sheet No. 200

Effective July 29, 2013

Applicability: III. Late Payment Charge (Rule 6 – Part A) states, “...Unless otherwise specified in the customer’s contract, a late payment charge at the rate of 1.0% per month will be applied to the customer’s current bill for all unpaid balances past due.”

Staff finds that CNG’s practice of applying late payment charges one day past the due date does, in fact, conflict with the company’s tariff. In the Settlement Agreement approved by the Commission in Docket No. UG-060256 on Jan. 12, 2007, under “Level of Charges,” it states in pertinent part that, “Staff, the Company, Public Counsel, NWEC, and the Energy Project agree that the Miscellaneous Service Charges shall be as follows:⁶

Late Fee 1 percent per month, applied to all unpaid balances 30 days past due”

Based on the findings that CNG is applying late payment charges in conflict with the company’s tariff, on July 25, 2013, Staff sent a data request to CNG asking the company to provide a list of all customers who were charged interest on late payments between July 1, 2011, and June 30, 2013. Staff reviewed the data submitted by CNG on August 21, 2013 and counted the number of customers who were charged interest on late payments. Staff counted 382,160 customers impacted by late payment charges between June 1, 2012 and June 30, 2013. The range of late payment charges (or interest fees) charged to individual customers in a single month ranged from one cent to \$2,324.45. [See table on the following page.]

⁵ A copy of Advice No. CNG/W13-06-01, First Revision Sheet No. 200, Canceling Original Sheet is attached as Appendix D.

⁶ A copy of UG-060256, Settlement Agreement, page 8, listing late fees is attached as Appendix E.

		Number of CNG customers assessed 1% late payment charges	Range of the 1% late payment charges added to customers monthly payments past due	
2012	Jun	29,976	0.01¢	\$347.37
	Jul	24,701	0.01¢	\$362.65
	Aug	30,701	0.01¢	\$1,059.57
	Sept	26,118	0.01¢	\$2,324.45
	Oct	29,459	0.01¢	\$623.47
	Nov	29,991	0.01¢	\$623.47
	Dec	30,729	0.01¢	\$623.47
2013	Jan	36,684	0.01¢	\$629.70
	Feb	28,966	0.01¢	\$966.06
	Mar	19,502	0.01¢	\$1,918.00
	Apr	28,277	0.01¢	\$160.67
	May	38,233	0.01¢	\$1,917.78
	June	28,823	0.01¢	\$72.84
Total		382,160		

WAC 480-90-178(1)(b) provides that customer bills must show the total amount due and payable.

Staff found 382,160 violations of RCW 80.28.080 and WAC 480-90-178(1)(b) between June 1, 2012 and June 30, 2013, for incorrectly charging customers late payment fees.

Staff also found that CNG violated WAC 480-80-010(4), which states, “No deviation from the rules is permitted without written authorization by the commission. Violations will be subject to penalties as provided by law.” CNG did not seek or receive authorization from the commission to deviate from its tariff when applying late payment fees. CNG further demonstrates deviation from its tariff by including the following language on its customer billing statements: “Any balance remaining after the due date is subject to a late payment charge of 1.00% per month.”⁷

Recommendation

Staff recommends a penalty of up to \$382,160 for 382,160 violations of WAC 480-90-178(1)(b) and RCW 80.28.080(1) between June 1, 2012, and June 30, 2013, for incorrectly charging customers late payment fees.

Staff considers this report as technical assistance for the company’s violation of WAC 480-80-010(4) for failure to seek or receive authorization from the commission to deviate from its tariff. If future violations are found, staff may recommend penalties or take other enforcement action.

⁷ A copy of a customer’s bill showing statement of late payment charge after bill due date is attached as Appendix F.

DISCONNECT FEES

WAC 480-90-128(6)(k) allows utility companies to charge a fee for a disconnect visit if an employee dispatched to disconnect service accepts payment in lieu of disconnection, and the disconnect visit fee is documented in the company's tariff.

Specifically, WAC 480-90-128(6)(k) provides:

A utility representative dispatched to disconnect service must accept payment of a delinquent account at the service address, but will not be required to give change for cash paid in excess of the amount due and owing. The utility must credit any overpayment to the customer's account. The utility may charge a fee for the disconnection visit to the service address if provided for in the utility's tariff.

The rules allow a company to charge a disconnect visit fee if the company goes to the residence to disconnect service, but the customer instead makes a payment to prevent the disconnection. The disconnect visit fee compensates the company for making the trip to the customer's home, but not disconnecting service. In the event of an actual disconnection, the company is compensated for disconnection costs by the reconnection fee.

Staff finds that CNG is charging customers in conflict with WAC 480-90-128(6)(k) by incorrectly charging a \$10 disconnect visit fee when disconnection actually occurs. In a Sept. 26, 2013, telephone conversation, CNG stated, "When a field tech goes to a residence for a disconnect there is a \$10 service fee charge. If the customer pays by check or money order at the door, the service is not disconnected, but a \$10 service fee is still assessed. If the customer has no resources to pay the bill at the time of the tech's field visit, the service is disconnected and the customer is assessed the \$10 fee. In order to reestablish service, a \$24 reconnect fee is charged."

The following table contains the current language in CNG's Tariff under Substitute First Revision Sheet No. 200, Cancelling Original Sheet No. 200, and effective July 29, 2013:

Company	Disconnect Visit Charge
Cascade Natural Gas Tariff WN U-3 Schedule 200 Applicability: II Disconnect Visit Charge (Rule 5)	A disconnect charge of \$10 may be charged, whenever Cascade is required to visit a customer's address for the purpose of disconnecting service.

The following table contains the current language for the disconnection visit fee in CNG’s Tariff under Ninth Revision Sheet No. 9, Cancelling Eighth Revision Sheet No. 9, and effective Dec. 1, 2013, language which has remained unchanged for some time:⁸

CNG WN U-3, Ninth Revision Sheet No. 9
Cancelling Eighth Revision Sheet No. 9
Effective December 1, 2013

Rule 5 – Notification of and Discontinuation of Service, states “The Company may or shall discontinue service for any of the following reasons and if service is discontinued for any reason listed herein below, a charge of \$24.00 during regular business hours or \$60.00 during non-business hours may be made against the customer for reconnection.

...

If the Company dispatches an employee to discontinue service, an \$10.00 service charge may be assessed by the Company to cover expenses incurred.

CNG’s current published tariff does not specify that the disconnect visit charge applies only if CNG visits a customer for the purpose of disconnecting service and accepts payment in lieu of disconnection. As such, CNG’s tariff is inconsistent with WAC 480-90-128(6)(k).

Further, CNG charges customers a \$10 disconnect visit fee when field staff is dispatched to disconnect service whether they accept payment in lieu of disconnection, or actually disconnects their service. CNG’s practice is to also charge the disconnected customers a reconnection fee when the customer reconnects to service.

The current tariff language in Schedule 200 related to the disconnect visit charge is unchanged from language originally added to Tariff WN U-3, Schedule 200 that became effective Jan. 19, 2007, as part of a compliance filing accepted by the Commission in Docket UG-060256, a general rate case.⁹ In that case, the Commission adopted a multi-party settlement agreement in which the parties specifically agreed on miscellaneous charges, including CNG’s \$10 disconnection visit charge. Staff’s review in this investigation of the testimony and the agreement filed by CNG, public counsel, and UTC staff in UG-060256 found that the parties understood this to be an *increase* to the “disconnection visit charge” not a new charge, but there was no discussion in the testimony about the specific nature of the charge and when it is collected.

Historically, Tariff WN U-3, Rule 5 stated that a service charge could be assessed if the company dispatched an employee to discontinue service, but the customer paid the employee the required amount to maintain service. Following is the CNG’s tariff rule effective 1996 specific to the disconnection visit charge:

⁸ A copy of Ninth Revision Sheet No. 9 is attached as Appendix G.

⁹ A copy of Jan. 18, 2007 letter by UTC Executive Secretary along with original Schedule 200 is attached as Appendix H.

CNG WN U-3, Fifth Revision Sheet No. 9
Cancelling Fourth Revision Sheet No. 9
Effective August 1, 1996

Rule 5 – Notification of and Discontinuance of Service, states “The Company may or shall discontinue service for any of the following reasons and if service is discontinued for any reason listed herein below, a charge of \$16.00 during regulator business hours or \$32.00 during non-business hours may be made against the customer for reconnection.

...

If the Company dispatches an employee to discontinue service, and customer pays delinquent amount to the dispatched employee, an \$8.00 service charge may be assessed by the Company to cover expenses incurred.”

CNG revised its disconnect visit charge language in a tariff filing on May 31, 2001, presenting it to the commission as a change in text for clarification. (“Sixth Revision Sheet No. 9”).¹⁰ CNG’s cover letter stated, “The purpose of this tariff filing is to update the Company’s rules and regulations in accordance with revisions to the Gas Operating rules (WAC 480-90) which becomes effective on June 4, 2001. Since this filing does not involve a change in the rates to be charged to customers, no Notice to the Public has been posted.”

The revision related to disconnection visit charges (shown in the following table) went into effect by operation of law on July 1, 2001, based on the Company’s representation that its practice had not changed. The \$8.00 disconnection service charge language was coded as a (T), or text change for clarification; it was not identified as a new rate, service, or changed condition or regulation.

CNG WN U-3, Sixth Revision Sheet No. 9
Cancelling Fifth Sheet No. 9
Effective July 1, 2001

Rule 5 – Notification of and Discontinuation of Service, states “The Company may or shall discontinue service for any of the following reasons and if service is discontinued for any reason listed herein below, a charge of \$16.00 during regular business hours or \$32.00 during non-business hours may be made against the customer for reconnection.

...

If the Company dispatches an employee to discontinue service, an \$8.00 service charge may be assessed by the Company to cover expenses incurred. (T)

When CNG made its compliance filing in UG-060256, it also updated Sheet No. 9 to reflect the increase in the disconnect visit fee from \$8.00 to \$10.00 (Eighth Revision Sheet No. 9).¹¹

CNG is the only utility that assesses disconnection visit fees both when the Company dispatches an employee to disconnect service and the customer is able to pay the required amount, and

¹⁰ A copy of CNG\W01-05-01, the cover page for the tariff filing, dated May 31, 2001 (UG-010794), along with Sixth Revision Sheet No. 9, is attached as Appendix I.

¹¹ A copy of Eighth Revision Sheet No. 9, effective January 19, 2007, and remaining effective through Dec. 1, 2013, is also included in Appendix H. The pertinent language in the currently effective page is the same.

when the company employee disconnects service because the customer is unable to pay the required amount due. The following table documents the current disconnect visit fees other utilities charge, as authorized by each company's tariff.

Company	Gas Companies Disconnect Visit Fees
<p>AVISTA Tariff WN U-29 Schedule 170</p>	<p>An \$8 fee will be assessed for disconnection visits that have one of two results: 1) collection of payment from the customer, and 2) the customer makes representation of payment. The Customer will receive one free disconnection visit on a 12-month rolling basis.</p>
<p>PSE Tariff WN U-2 Rule 9, Section 10</p>	<p>When a visit by a Company representative to the Customer's service address for the purpose of disconnection does not result in disconnection of service, a service fee of \$13.00 will be charged for each visit when the visit does not result in a disconnection of service...</p>
<p>Northwest Natural Gas Tariff WN U-6 Schedule C Miscellaneous Charges</p>	<p>A charge of \$15 will be assessed to customer when the company goes to the premise to disconnect service for non-payment and the visit does not result in termination of service.</p>
<p>PacifiCorp Tariff WN U-75 Schedule 300</p>	<p>The company may assess the customer field visit charge when payment is collected at the service address or when the employee, without receiving payment, does not disconnect at the customer's request.</p>

On Sept. 9, 2013, staff requested CNG provide a list of all residential customers in Washington State who were disconnected for non-payment during the two-week period of May 15 through May 31, 2013. On Sept. 24, 2013, CNG provided documentation indicating the number of customers who were disconnected from service for non-payment from May 15 through May 31, 2013. In that two-week timeframe, 324 customers were disconnected for non-payment and were charged a \$10 disconnect visit fee. If any of these 324 customers reconnected to service, they were also charged a reconnection fee.

CNG's tariff for disconnection visit fees is inconsistent with the tariffs of every other regulated gas and electric utility in Washington, which specifically allows the disconnection fee to be charged when the visit does not actually result in a disconnect. RCW 80.04.110 allows the commission to file a complaint against a gas company for violation of law or challenging the reasonableness of the company's schedule of rates and charges. RCW 80.28.020 allows the Commission, upon complaint, to set just and reasonable rates.

Recommendation

Staff finds CNG's tariff, specifically its disconnection visit fee, to be inconsistent with WAC 480-90-128(6)(k). Staff recommends the commission find CNG's disconnection visit fee unreasonable, and inconsistent with law, require the company to revise its tariff to be consistent with the intent of the law and determine whether Cascade should be required to refund customers disconnection visit charges assessed after the effective date of the complaint.

STATEMENT MAILING AND PAYMENT DATES

WAC 480-90-178(2) requires utility companies to allow a minimum of 15 days for payment after the date the billing statement is mailed, which does not include the day of mailing. On Oct. 2, 2013, staff requested CNG provide documentation of Washington customer billing statement dates and corresponding mailing dates.¹² The CNG contact person responded with a mail batch report, dated April 15, 2013, and a customer billing statement associated with that specific batch.¹³ The report documents that the billing statements were dated April 12, and were not metered for postage until 5:51 p.m., Central Time, April 15, 2013. There are 13 days between April 16 and April 29, the due date reflected on the bill.

Recommendation

Staff finds that CNG violated WAC 480-90-178(2) by failing to allow a minimum of 15 days between the mail date and the date payment was due, which impacted 24,280 customers. Staff considers this report as technical assistance related to violations of WAC 480-90-178(2). If future violations are found, staff may recommend penalties or take other enforcement action.

¹² A copy of staff's email, dated Oct. 2, 2013, requesting bill statement and mailing dates is attached as Appendix J.

¹³ A copy of CNG's Batch Report, dated April 15, 2013, is attached as Appendix J. A copy of the sample customer billing statement, dated April 12, 2013, is attached as Appendix L.

BELLINGHAM CITY TAX

On Jan. 18, 2013, in Docket UG-130080, CNG filed a tariff revision to its Tariff WN U-3, Tax Schedule No. 500.¹⁴ In Advice No. CNG\W13-01-01, CNG stated, “The tariff revision will allow Cascade to pass through tax assessments by municipalities to ratepayers on a going forward basis. Cascade’s tariffs currently do not allow for such a recovery. This filing has been prompted by the Commission’s recent action in Docket UE-121439 in which Puget Sound Energy proposed and was granted a similar tariff revision.”¹⁵

Bellingham’s city ordinance considers taxes as part of the gross receipts and, in essence, creates a city tax on the city tax. CNG’s tariff revision (Seventy-Fourth Revision Sheet No. 500) effective by operation of law on Mar. 1, 2013. CNG calculated the pass through city tax on city tax at 0.383 percent and, beginning March 2013, this was reflected on Bellingham customers’ billing statements.

On Sept. 10, 2013, staff sent a data request asking CNG to provide copies of billing statements from Jan. 13, 2013, to June 30, 2013, for 100 randomly selected account numbers. CNG responded on Sept. 24, 2013. Staff reviewed the customer billing statements and discovered that Bellingham customers were charged a 6.0 percent city tax for January and February. However, the March through June billing statements showed customers were charged a 6.383 percent city tax.¹⁶ CNG reported to staff that it served 22,264 customers inside Bellingham city limits in March 2013.

On Dec. 3, 2013, staff contacted the City of Bellingham Finance Office, to determine the tax rate CNG was passing through to Bellingham. City of Bellingham staff stated that CNG was paying the city tax rate at 6.383 percent, which is higher than the voter approved 6.0 percent tax rate. City of Bellingham staff stated that the city had been holding CNG’s overpayment, and that CNG had been notified that they had a large credit of \$18,730.21.¹⁷

Staff conferred with the City of Bellingham Financial Office staff and CNG staff, and found that CNG did not separately identify the 0.383 percent pass through tax assessment on customers’ billing statements, but instead, added it to the 6.0 percent city tax rate. The billing statements for Bellingham customers showed a 6.383 percent “city tax,” however; CNG’s tariff specifies a 6.0 percent city tax for Bellingham.

Based on its investigation of this issue, staff is satisfied the correct fees are being passed through to Bellingham by CNG, but the fees were reported in a way that made it appear CNG was collecting a higher tax rate than the tariff allowed. The form CNG is using to report gross receipts and the tax rate to the City of Bellingham is outdated, and CNG was incorrectly reporting the Bellingham tax rate on the form as 6.383 percent.¹⁸ On Dec. 13, 2013, CNG staff told staff in a telephone conversation that in order to eliminate future confusion, the company

¹⁴ A copy of CNG Tariff, Tax Schedule No. 500 A, Tax Additions is attached as Appendix M.

¹⁵ A copy of Advice No. CNG\W13-01-01, dated Jan. 18, 2013, is attached as Appendix N.

¹⁶ A copy of a Bellingham customer’s billing statement showing city tax rate at 6.383 percent is attached as Appendix O.

¹⁷ A copy of Bellingham tax return, re: \$18,730.21 credit for overpayment of city taxes is attached as Appendix P.

¹⁸ A copy of the form CNG used to report gross receipts/tax rate to City of Bellingham is attached as Appendix Q.

will improve its tax reporting forms sent to the City of Bellingham to ensure the taxes and effective tax rates paid to Bellingham are correctly identified. CNG staff also said that the company would request approval from the commission to modify language in its tariff to clarify the charges billed to customers.

On Mar. 21, 2014, in an effort to clarify the Bellingham city tax in its tariff, CNG filed Advice No. CNG/W14-03-01, along with the Seventy-Fifth Revision Sheet No. 500 (Docket UG-140459). As stated in the cover letter, the tariff revision “identifies the actual rate charged to customers in the City of Bellingham” and also “provides a footnote explaining the difference between the customer’s billed rate and the city ordinance rate.”¹⁹ CNG filed a substitute replacement tariff sheet on March 31, 2014. The Seventy-Fifth Revision, Sheet No. 500 identifies the Tax Addition for Bellingham as 6.383 percent, with a footnote that states: “The rate established by Ordinance is 6% up to \$250,000 plus 1% over \$250,000, however, the City of Bellingham’s definition of gross revenue includes this tax, and therefore, the billable rate to customers must be adjusted to also include the effect of applying the tax rate to the taxes.”²⁰ This tariff revision was allowed to become effective by operation of law with an effective date of May 1, 2014.

Recommendation

Staff finds that CNG violated WAC 480-90-178(1)(g) by incorrectly identifying the tax rate collected for City of Bellingham customers on its billing statements for 22,264 Bellingham customers in March 2013. Staff considers this report as technical assistance related to the 22,264 violations of WAC 480-90-178(g) for issuing incorrect billing statements. If future violations are found, staff may recommend penalties or take other enforcement action.

Further, because CNG did not notify customers of the change in charges, staff also finds 22,264 violations of WAC 480-90-195(2), which provides that, “A utility that files a tariff change to increase any charge that a customer may incur without being quoted a rate or price (e.g., late payment fee, insufficient fund charges, or a one-time charge) must provide notice to each affected customer on or with the first bill after the change becomes effective.” Staff considers this report to be technical assistance related to the 22,264 violations of WAC 480-90-195(2) for failure to provide customers notice of the tariff change.

¹⁹ A copy of Advice No. CNG/W14-03-01, dated Mar. 21, 2014, is attached as Appendix R.

²⁰ A copy of Seventy-Fifth Revision Sheet No. 500, is attached as Appendix S.

BELLINGHAM LATE PAYMENT CHARGES

In the course of conducting this investigation into the extent and frequency of CNG billing errors, staff reviewed the billings statements CNG submitted in response to the Sept. 10, 2013, data request. During the review, staff discovered the late payment charges were incorrect on the March 2013 customer billing statements. Some customers were charged less than one percent in late payment charges, while others were charged more than the one percent in late payment charges. On Sept. 27, 2013, staff requested CNG provide an explanation for the incorrect charges.

On Oct. 8, 2013, CNG responded by email and provided the following explanation: “Effective on March 1 the Commission approved a language change on Schedule 500 (municipal tax schedule) allowing the company to charge differently for Municipal Taxes in Bellingham per the city’s interpretation of the language in the city ordinance. With the implementation of this change, the Late Pay Charge calculation inadvertently started rounding the late pay fee calculation to the nearest dollar within the Customer Information System. The problem was realized on March 14. The company decided to reverse the late payment fees for all charges that rounded up and recalculate the correct amount. The programming effort to reverse and correct the algorithms for rebilling took the rest of March and April to complete so the correction showed on the May billing.”²¹

Even though the tax issue related to the city of Bellingham only, CNG customers with late payment charges statewide were affected by CNG’s billing error. On Feb. 5, 2014, CNG confirmed by email that 1,511 customers were incorrectly billed late payment charges in March 2013.²² Of the 1,511 customers who received incorrect billing statements, 929 were overcharged late payment charges.²³ CNG credited customers the full overcharge and applied the correct late payment charge on the May 2013 billing statements.²⁴

CNG did not correct the undercharge for the remaining 582 customers who were issued incorrect billing statements in March 2013.

Recommendation

RCW Staff finds 1,511 violations of WAC 480-90-178(1)(b) and RCW 80.28.080(1)(a) for issuing inaccurate billing statements with incorrect late payment charges in March 2013, and recommends a penalty of \$15,110 for these violations.

²¹ A copy of email, dated Oct. 8, 2013, regarding incorrect charges on late payment fees is attached as Appendix T.

²² A copy of email, dated Feb. 5, 2014, regarding late payment charge is attached as Appendix U.

²³ A copy of a Customer’s March 2013 bill, showing a late payment overcharge is attached as Appendix V.

²⁴ A copy of Customer’s May 2013 bill, showing refund and correct March late payment charge is attached as Appendix W.

FEDERALLY RECOGNIZED INDIAN NATION TAX CREDIT

CNG's Tax Schedule No. 500(B) Applicability provides:

“This schedule applies to gas service rendered by the company within the state of Washington in territory specified herein and under its tariff schedules and contracts for service, which specifically refer to this tax schedule. The charges otherwise payable by the customer under the tariff schedules or contracts specifically referring to this Tax Addition Schedule shall be decreased with all bills issued for meter readings on or after the effective date shown.

In accordance with WAC 458-20-192(7)(b) the rates and charges specified in this tariff shall be reduced for all Federally Recognized Indian Nation and tribal and member accounts, located and service provided within the boundaries of a Federally Recognized Indian Nation. Each applicable customer must apply on an individual account basis to Cascade to receive this tax credit.”²⁵

Within the data submitted by CNG in response to Staff's data request on Sept. 10, 2013, staff identified Customer F, who is eligible for, but not receiving, the Indian Nation tax credit. Staff contacted the Yakama Nation, and the Yakama Nation confirmed that Customer F is an enrolled member whose service address is located on Yakama Nation Land. Staff requested CNG provide an account history to determine if Customer F had applied for the allowed tax exemption. In addition, CNG was requested to provide an account history showing the application for tax exemption for a random customer, Customer G, who is receiving the Indian Nation tax credit.

The CNG contact person responded that CNG could not find anything in company records that either Customer F or Customer G had applied for tax exemption credit, although Customer G is receiving the state utility tax credit and Customer F is not.²⁶ CNG stated that Customer G's application for tax exemption must have been lost when the company changed billing systems.

Customer F's account history shows that she would benefit from tax exemptions. From the dates of Oct. 5, 2011, through Jan. 30, 2014, Customer F's service was disconnected at least five times. It is up to the enrolled tribal member to request tax exemption from the utility company. The exemption is addressed in CNG's tariff.

Recommendation

Staff urges CNG to counsel eligible customers about the availability of the exemption, and make information about the exemption prominent on its website. Staff considers this recommendation to be technical assistance.

²⁵ A copy of Tax Schedule No. 500 (B) is attached as Appendix X.

²⁶ A copy of a Customer billing statement, without a state utility tax credit, is attached as Appendix Y. A copy of a Customer billing statement, with a state utility tax credit, is attached as Appendix Z.

SUMMARY OF RECOMMENDATIONS

Penalty

Staff typically recommends a “per violation” penalty against a regulated company where the violations result in serious consumer harm; for repeat violations of a rule after the company receives technical assistance; or for intentional violations of commission laws or rules. The commission has the authority to assess penalties of \$100 per violation, per day against a regulated company without providing the opportunity for a hearing.²⁷ The commission also has the authority to assess penalties of up to \$1,000 per violation, per day following a formal complaint and hearing.²⁸

In this investigation, staff found that CNG:

- Failed to follow its own tariff by inappropriately charging late payment fees to customers;
- Charged both disconnection and reconnection fees;
- Failed to allot the required time between the date billing statements are placed in the mail and the date customers are required to make payment;
- Charged late payment fees to all Washington customers instead of just City of Bellingham customers; and
- Charged Bellingham customers an incorrect amount on billings statements.

Staff recommends the commission issue a formal complaint assessing a total penalty of up to \$397,270 for the violations cited in this report. Staff believes that both the number and seriousness of the violations warrant a penalty of this size. Staff considered the following factors in making its recommendation:

1. How serious or harmful the violation is to the public.

Staff finds that many of the violations cited in this report resulted in overcharges to customers. CNG is applying interest on fees for past due accounts approximately two weeks earlier than the company’s tariff allows, creating additional fees.

In addition, CNG has not met the requirement of ensuring customers receive 15 days from the date their statement is mailed to pay their bill.

CNG is also deviating from commission rules and industry practice by charging customers fees for both disconnection and reconnection of service. Some of the customers affected by this practice are among the least able to afford additional fees.

2. Whether the violation is intentional.

Staff believes the evidence supports a finding that CNG knew, or should have known, that late payments charges were applied to customer accounts in deviation from its own tariff. CNG staff testimony in Docket UG-060256 reflects that the company accepted commission staff’s proposal to apply 1.0 percent interest to bills over 30 days past due and this application is documented in Settlement Agreement, Level of Charges. The evidence also supports a finding that CNG

²⁷ RCW 80.04.405 allows the commission to assess an administrative penalty for any violation by a regulated company of a statute, rule, the company’s own tariff, or commission order.

²⁸ RCW 80.04.380 allows the commission to assess a penalty of up to \$1,000 for each violation following a hearing.

intentionally charged, and continues to charge, customers both disconnection and reconnection fees.

3. Whether the company self-reported the violation.

When CNG applied increased fees statewide in error, they did not self-report the error to the commission, nor did the company notify its customers about either the error or the correction.

4. Whether the company was cooperative and responsive.

CNG was somewhat cooperative and responsive. The initial data request, submitted July 25, 2013, had a due date of Aug. 16. CNG did not fully respond to the data request until Aug. 21, 2013.

5. Whether the company promptly corrected the violations and remedied the impacts.

CNG reports they discovered they were applying the City of Bellingham tax to customers statewide in March 2013. The error was corrected in May 2013.

CNG continues to charge customers both disconnection and reconnection fees in violation of WAC 480-90-128(6)(k). CNG also continues to apply a 1.0 percent late payment charge sooner than permitted in violation of the company's tariff.

CNG stated it would file changes to its tariff to make the language clear on approved fees for the City of Bellingham. As of the date of this report, CNG has not filed a tariff revision.

6. The likelihood of recurrence.

The violations are continuous and ongoing.

7. The company's past performance regarding compliance, violations and penalties.

The commission has not previously taken enforcement action against CNG for its business practices. This investigation was prompted by a commission-referred consumer complaint. Since 2011, 49 CNG customers have filed complaints with the commission. Of those 49 complaints, 30 were company upheld; six were company upheld with arrangements; 12 were consumer upheld; and one complaint was still open as of the date of this report. One of the complaints resulted in CNG refunding 498 customers over a two year period for incorrect charges of a city tax, for a total refund amount of \$114,405.76.

8. The company's existing compliance program.

Staff is not aware of any existing compliance program related to the issues addressed in this investigation.

9. The size of the company.

CNG serves more than 260,000 customers in Washington and Oregon. CNG serves 68 communities in Washington, concentrated in the western and central regions of the state. The Cascade Natural Gas Headquarters is located in Kennewick, Washington. CNG reported \$208,856,467.00 in revenue for Washington in the 2012 reporting period.

Recommendations

Staff recommends the commission issue a formal complaint and assess penalties of up to \$397,270 for the following violations:

- Up to \$382,160 for 382,160 violations of RCW 80.28.080(1)(a) and WAC 480-90-178(1)(b), for incorrectly charging late payment charges from June 1, 2012, to June 30, 2013.
- Up to \$15,110 for 1,511 violations of RCW 80.28.080(1)(a) and WAC 480-90-178(1)(b) for incorrect billing of late payment charges in March 2013.

In addition, Staff finds CNG's tariff setting out disconnection visit fees to be inconsistent with WAC 480-90-128(6)(k). Staff recommends the commission find the tariff language regarding disconnection visit fees is unreasonable and inconsistent with law. Staff recommends the company be required to revise its tariff to be consistent with the intent of the law and determine whether Cascade should be required to refund customers disconnection visit charges assessed after the effective date of this complaint.

Staff also recommends that CNG carefully review this report because it contains valuable technical assistance for the following violations:

- 4 violations of RCW 80.04.380 for untimely and incomplete responses to staff's data request.
- 1 violation of WAC 480-80-010(4) for failing to seek or receive authorization to deviate from tariff.
- 22,264 violations of WAC 480-90-178(1)(g) for issuing incorrect billing statements.
- 24,280 violations of WAC 480-90-178(2) for not allowing the required time between statement mailing and payment due dates.
- 22,264 violations of WAC 408-90-195(2) for not notifying customers of a change in charges.

APPENDIX A

Consumer Complaint		Cascade Natural Gas Corporation	117725
Customer Info			
Customer:	[REDACTED]	Primary Phone:	[REDACTED]
Contact:	[REDACTED]	Other Phone:	[REDACTED]
eMail Address:		Fax:	
Privacy Confidential:	<input type="checkbox"/> Yes		
Address			
Service Address:	[REDACTED]	Mailing Address:	[REDACTED]
City, State, Zip:	Zillah, WA 98953	City, State, Zip:	Zillah, WA 98953
County:	Yakima		
Complaint Info			
Class of Service:	<input checked="" type="radio"/> Residential <input type="radio"/> Business		
Complaint Group:	Disconnect Lookup	Complaint Keyword:	(None)
Company ID:		Account Number:	94822909357
G021	Cascade Natural Gas Corporation	Status: Closed as of:	08/30/2013
Company Rep:	Jennifer Moffett	Initially Opened on:	06/03/2013
Rep Email Address:		Quality Review:	<input checked="" type="checkbox"/> Done
Agency Rep:	Matthew Mueller	Closed on:	08/30/2013
Disputed Amount:		Referral:	Company
Contacted How?			
Complaint Description:	<p>Called about having three notices with the same notice date of April 30, 2013 but with three different billing amounts. The three billing amounts are \$662, \$466.98 and \$498. Customer had talked to a company representative, Pam and was told she could not talk to a supervisor. Customer had paid \$170 on May 18, 2013 and the company has not shown credit to her account.</p> <p>Passed to Cascade Natural Gas on June 3 at 3:30 via email, response due by June 5 by 5 pm.</p>		
Results:	<p>The company was not in compliance, the notices had the wrong amount. The company was applying the late fee rule wrong causing an overall credit of \$22.21.</p> <p>Total violations: 153,985</p>		
Closure Status			
Disposition:	Consumer upheld	Company Profile:	
Amount Saved:	\$22.21	Violation(s):	480-90-173(3)(c) 5, 480-90-178(1)(b) 5, 480-90-128(6)(a)(ii) 5, 80.28.080 153974, 480-90-113(3)(a) 1
Categories			
Industry:	150 - Natural Gas	Docket Number:	

This document can be read by all users of the database.
This document can be edited by: [ComplaintEditors]

APPENDIX B



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • www.utc.wa.gov

July 25, 2013

Mike Parvinen
Cascade Natural Gas Corporation
8113 W. Grandridge Boulevard
Kennewick, WA 99336-7166

Dear Mr. Parvinen:

The Utilities and Transportation Commission is conducting an investigation into the business practices of Cascade Natural Gas Corporation (CNG) related to interest collected on past due accounts.

Under Washington state law, RCW 80.04.090, the commission has the authority to inspect the accounts, books, papers, and documents of any investor-owned electric or natural gas company doing business in this state.

In order to complete this investigation, commission staff requires the following documents and information:

1. A list of customers with account numbers, by month, in Washington state who were billed interest charges for late payments from July 1, 2011 through June 30, 2013.
2. The number of complaints, by month, the company received from Washington state customers related to late payment charges from July 1, 2011, through June 30, 2013.
3. The name, title, telephone number, and email address of the CNG contact person that our staff can work with directly for questions that may arise concerning any details of the data provided.

APPENDIX B (continued)

Mike Parvinen
July 25, 2013

All requested documents and information must be provided by **Aug. 16, 2013**, in electronic format using Microsoft Word for narrative documents and Excel for data. Please send the data to Susie Paul, Compliance Investigator. Ms. Paul can be reached at (360) 664-1105 or spaul@utc.wa.gov. Thank you for your attention to this matter.

Sincerely

A handwritten signature in blue ink, appearing to read "S.V. King".

Steven V. King
Acting Executive Director and Secretary

APPENDIX C



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • www.utc.wa.gov

September 9, 2013

Mike Parvinen
Cascade Natural Gas Corporation
8113 W. Grandridge Boulevard
Kennewick, WA 99336-7166

Dear Mr. Parvinen:

The Utilities and Transportation is currently investigating the business practices of Cascade Natural Gas Corporation (CNG) related to disconnection of electric and natural gas services for nonpayment.

1. A list of all residential customers (electric and natural gas) in Washington state who were disconnected for nonpayment during the two-week period of May 15 through 31, 2013.
2. For each customer listed, provide a document or worksheet that shows the complete statement of debit and credit activity for the period of April 15 through May 15, 2013. This includes late fees, current charges, pledges, payments, service charges, reconnect fees, disconnect fees, etc. and the balances owing after each application. Please separate the account histories by account number or address, if different.
3. The name, title, telephone number, and email address of the CNG contact person that our staff can work with directly for questions that may arise concerning any details of the data.
4. Provide copies of all billing statements from Jan. 2013 through June 2013 for the 100 customers identified by account number, listed on page 3.

APPENDIX C (continued)

Mike Parvinen
September 9, 2013
Page 2

Please provide all requested documents and information by Sept. 23, 2013. The response should be directed to Susie Paul, Compliance Investigator, Consumer Protection. Ms. Paul can be reached at (360) 664-1105 or spaul@utc.wa.gov. Thank you for your attention to this matter.

Sincerely,



Steven V. King
Executive Director and Secretary

APPENDIX C (continued)

Mike Parvinen
September 9, 2013
Page 3

Please provide Jan. 2013 through Jun. 2013 billing statements for the listed accounts:

1	4778300000	51	2473400000
2	9487872459	52	8060252314
3	3207210000	53	2984287261
4	0325010000	54	1206461978
5	4882300000	55	0374181342
6	3466510000	56	6211510000
7	3430613811	57	0032888154
8	2728700000	58	8784410000
9	5664231269	59	9032200000
10	7668210000	60	1429693152
11	8675300000	61	7612959632
12	5757727709	62	0864204127
13	6645698873	63	4992803743
14	6095300000	64	8964310000
15	4132110000	65	0043710000
16	6508510000	66	0132690487
17	0400000000	67	1099100000
18	8902119335	68	3479813048
19	4621210000	69	7401010000
20	8967010000	70	0964910000
21	1201720931	71	5672010000
22	9359879177	72	5078768896
23	0364700000	73	0494504316
24	1081756078	74	5846300000
25	3100598702	75	4169310000
26	0643648540	76	0651410000
27	7098324925	77	4501120000
28	8866670980	78	0334310000
29	7973220000	79	4668502710
30	6587034812	80	2473510000
31	8713410000	81	9710000000
32	8351220000	82	7646440400
33	5709700000	83	1810000000
34	3763410000	84	5191701685
35	9151858111	85	9994900000
36	7636410000	86	9573680102
37	0445710000	87	2815796617
38	8877326668	88	7145210000
39	1983446049	89	7040108977
40	3063220000	90	8354073219
41	8293870445	91	9849480762
42	5932543656	92	2560305297
43	3759522149	93	9380120000
44	2079497208	94	1660107770
45	6614521537	95	3605468381
46	2835385845	96	5839259269
47	8221600000	97	7747161035
48	8008810000	98	8706708486
49	4213622792	99	5410563772
50	2740790767	100	8734207994

APPENDIX D



8113 W. GRANDRIDGE BLVD., KENNEWICK, WASHINGTON 98336-7168
TELEPHONE 509-734-4500 FACSIMILE 509-737-9803
www.cngc.com

June 28, 2013

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

RE: Advice No. CNG/W13-06-01

Dear Mr. King:

Enclosed, Cascade Natural Gas Corporation ("Cascade") submits the following substitute tariff sheet containing an effective date of July 29, 2013.

First Revision Sheet No. 200 Canceling Original Sheet No. 200

The purpose of this filing is to modify the text associated with the Company's Late Payment Charge. The proposed modification is to realign the language in the tariff with customer bills. In Docket UG-060256 the current language was approved based on the then current billing system. In 2011, the Company changed billing systems and the bills now show a due date instead of just the amount due. The Company still applies the Late Pay Fee as it has since approval of the tariff. Nothing has changed except providing a date on the bill which then creates confusion with the language on the tariff. The proposed filing realigns the tariffs with the billing system and maintains compliance with UG-060256.

This filing has no impact to the rates and charges of the company nor does it represent any change in services provided by the Company.

Any questions regarding this filing may be directed to me at (509) 734-4593.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Parvinen", with a long horizontal flourish extending to the right.

Michael Parvinen
Director, Regulatory Affairs

Attachment

In the Community to Serve

APPENDIX E

Nos. ___ (KJB-1T) and ___ (KJB-2)), and certain testimony and exhibits of Company witness Jon T. Stoltz (Exhibit Nos. ___ (JTS-1T), ___ (JTS-10T) and ___ (JTS-11)).

13. Miscellaneous Service Charges.

a. Level of Charges. Staff, the Company, Public Counsel, NVEC, and The Energy Project agree that the Miscellaneous Service Charges shall be as follows:

Disconnect Fee	\$10.00
Reconnect Fee (during work hours)	\$24.00
After Hours Reconnect Fee	\$60.00 (except in case of medical emergency)
Pilot Light Service	\$20.00
Late Fee	1% per month, applied to all unpaid balances 30 days past due
Minimum Late Fee	None
Meter Tampering Fee	Actual costs
NSF Check Return Charge	\$18.00
New Premises Charge	\$45.00
Account Activation Fee	No charge
Short Notice Locate Fee	No charge

The Parties agree that for purposes of determining the Company's revenue requirement in this proceeding, these Miscellaneous Service Charges shall be deemed to produce revenues of \$1,442,480, or an increase of \$1,129,498 over test period revenues of \$312,982.

b. Evidentiary Support. As evidentiary support for these stipulated Miscellaneous Service Charges, the Parties cite certain testimony and exhibits of Staff witness Michael Parvinen (Exhibit Nos. ___ (MPP-1T), pages 22-25, and ___ (MPP-5)) and certain

SETTLEMENT AGREEMENT – Page 8

APPENDIX F



In the Community to Serve™

SERVICE FOR
 [REDACTED]
 MOUNT VERNON, WA 98273-3203

www.cngc.com

ACCOUNT NUMBER
 806 025 2314 6

BILL DATE
 Jan 11, 2013

PAGE 1 of 2

TOTAL AMOUNT DUE
\$303.06
includes past due amount

PAST DUE Reminder Your bill includes a past due amount. If you have recently made payment, thank you.

ACCOUNT SUMMARY

Previous Balance	\$207.49
Payments Received <i>No payment received</i>	-0.00
Past Due Amount Due Now	\$207.49
Debit Adjustments	1.91
Current Gas Charges	93.66
Amount Due on 1/28/13	\$303.06

Any balance remaining after the due date is subject to a late payment charge of 1.00% per month.

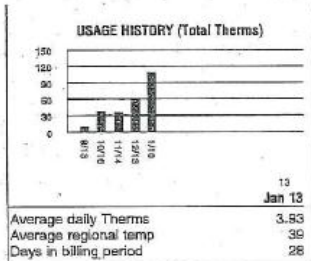
Gas Charges

BILLING PERIOD DAYS
 12/14/12 - 1/10/13 28

METER NUMBER
 472700096

METER READ DATE
 1/10/13
Next scheduled read 2/8/13

RATE
 503 - Residential Service



CURRENT READING	PREVIOUS READING	DIFFERENCE (GGF)	ENERGY FACTOR	PRESSURE FACTOR	THERMS USED
240	138	= 102	x 1.073390	x 1.008572	= 110

CUSTOMER SERVICE CENTER & EMERGENCY SERVICE

1-888-522-1130
 Emergencies: 24 hours a day
 Non-emergencies: Mon - Fri, 7am to 7pm
 Email: service@cngc.com
 Mail: Cascade Natural Gas Corporation,
 Attn: Customer Service, P.O. Box 7608, Boise, ID
 83707-9928. Please include your account number.

CALL BEFORE YOU DIG 811

Payment Due ▼	
PAST DUE AMOUNT	\$207.49 <i>Due NOW</i>
CURRENT CHARGES	95.57 <i>Due 1/28/13</i>
TOTAL AMOUNT DUE	\$303.06

Note: Charges for current services are due and payable upon receipt of bill and are past due as noted. **This bill does not extend the due date of past bills.**

Gas Charges - CONTINUED

Basic Service Charge \$4.00 per month	4.00
Delivery Charge 110 Therms x \$0.26248	28.87
Average Cost of Gas 110 Therms x \$0.50442	55.49
City Tax 6%	5.30
Total Gas Charges*	93.66
Late Payment Charge	1.91
Ending Total Gas Charges	\$95.57

**The current billing amount includes 3.852% state utility tax 3.61.*

PLEASE KEEP THIS PORTION FOR YOUR RECORDS.
 PLEASE RETURN THIS PORTION WITH YOUR PAYMENT, MAKING SURE THE RETURN ADDRESS SHOWS IN THE ENVELOPE WINDOW.



ACCOUNT NUMBER
806 025 2314 6

Your account is PAST DUE

Has your mailing address or phone number changed? Check here and provide details on back.

PAST DUE AMOUNT	CURRENT CHARGES	TOTAL AMOUNT DUE
\$207.49 Due NOW	95.57 Due Jan 28, 2013	\$303.06

10351



[REDACTED]
 MOUNT VERNON WA 98273-3203

8176

Please enter amount enclosed

\$

PO BOX 990065
 BOISE ID 83799-0065

Write account number on check and make payable to CNGC.

478060252314600000303060000012806

APPENDIX G

SUB 10/17/13

RECEIVED
OCT. 10, 2013
WA. UT. &
TRANS. COMM.
ORIGINAL 131925

Substitute Ninth Revision Sheet No. 9
Canceling
Eighth Revision Sheet No. 9

WN U-3

CASCADE NATURAL GAS CORPORATION

RULES AND REGULATIONS

RULE 5 - NOTIFICATION OF AND DISCONTINUANCE OF SERVICE

The Company may or shall discontinue service for any of the following reasons and if service is discontinued for any reason listed herein below, a charge of \$24.00 during regular business hours or \$60.00 during non-business hours may be made against the customer for reconnection.

- a. At the request, written or verbal, by the Customer.
- b. Non-payment of gas bill after first giving customer either eight (8) business days written notice after the delinquent date, which is fifteen (15) days following date of bill, or the discontinuance notice may be personally delivered by an employee of the utility, in which case service may not be discontinued prior to 5 p.m. of the first business day following delivery. If the delivered notice is for non-payment of a deposit, disconnection shall not be permitted prior to 5 p.m. of the sixth (6th) day following delivery. The time of discontinuance notice may be extended, at the option of the Company, depending upon the credit record of the individual customers.
- c. For use of gas for any other property or purpose than that described in the application.
- d. For willful waste of gas through improper or imperfect piping, appliances, or otherwise.
- e. For tampering with any part of any service line or meter or any other apparatus of Company. A meter tampering charge for the actual costs of damages, repairs or any additional or unusual costs or services directly related to the interference, plus the amount of unbilled gas determined to have been lost plus the applicable reconnect charges will be applied to the customers account.
- f. In case of vacation of premises by customer.
- g. For refusal of reasonable access to property to employees of the Company for the purpose of inspection of service lines or appliances, or for reading, maintaining or removal of meters.
- h. For use of gas in violation of any city ordinance, or state or federal statute applicable to the area served, or violation of rules and regulations.
- i. For resale of gas to others.
- j. For non-payment of any proper charges, including deposits.
- k. For fraudulent obtaining or use of service.
- l. For use of equipment which adversely affects the utility's service to its other customers.
- m. Under flat rate service, for increasing use of gas without approval of the utility.
- n. For failure of customer to eliminate any hazardous condition found to exist in his facilities (i.e. piping, venting, appliances, etc.)
- o. For payment of a delinquent balance with a check that is dishonored by a bank or financial institution.
- p. For failure to keep any agreed upon payment plan.

If the Company dispatches an employee to discontinue service, an \$10.00 service charge may be assessed by the Company to cover expenses incurred.

Except in case of danger to life or property, no disconnection shall be accomplished on Saturday, Sunday, legal holiday, or on any other day on which service cannot be reestablished on the same or following day.

(D)

CNG/W13-10-01

ISSUED October 10, 2013

EFFECTIVE December 1, 2013

ISSUED BY **CASCADE NATURAL GAS CORPORATION**
BY Michael Parvinen
Michael Parvinen

TITLE Director
Regulatory Affairs

APPENDIX H

[Service Date January 18, 2007]

January 18, 2007

Re: *Washington Utilities and Transportation Commission v. Cascade Natural Gas Corporation*, Docket UG-060256

TO ALL PARTIES:

The Washington Utilities and Transportation Commission (Commission) entered its Order 05 in this docket on January 12, 2007. Order 05, among other things, rejected revised tariff sheets filed by Cascade Natural Gas Corporation (Cascade or Company), on February 14, 2006, which were suspended by prior Commission Order. The Commission's Order 05 authorized and required the Company to file tariff sheets necessary and sufficient to effectuate its terms. Order 05 also authorized the Commission's Executive Secretary to accept the authorized filing by letter if it complied with the requirements of that Order.

On January 16, 2007, Cascade filed tariff sheets as specified in Order 05 as well as substitute tariff pages on January 17, 2007. A list of the tariff sheets is attached to this letter. The Commission has examined the filing and it appears to comply with the terms of that Order.

Therefore, pursuant to terms of Order 05, the tariff sheets indicated on the attachment to this letter will become effective as filed and substituted with an effective date of January 19, 2007, with the exception of Tariff Sheet No. 25, which will not become effective until the Commission approves the Company's Conservation Plan.

Sincerely,

CAROLE J. WASHBURN
Executive Secretary

Attachment

APPENDIX H (continued)

[Service Date January 18, 2007]

ATTACHMENT

Re: *Washington Utilities and Transportation Commission v. Cascade Natural Gas Corporation*, Docket UG-060256.

TARIFF SHEETS FILED IN COMPLIANCE WITH THE COMMISSION'S ORDER 05 IN DOCKET UG-060256

WN U-3 (Advice CNG/W06-02-01C):

33 rd Revision	Sheet No. 2	Index
17 th Revision	Sheet No. 2-A	Index (Continued)
8 th Revision	Sheet No. 9	Rules and Regulations, Rule 5, Notification of and Discontinuance of Service
10 th Revision	Sheet No. 10	Rules and Regulations, Rule 6, Billing
1 st Revision	Sheet No. 10-B	Rules and Regulations, Rule 6, Billing (Continued)
1 st Revision	Sheet No. 24	Rules and Regulations, Rule 20, Unbundled Distribution System Transportation Service Rules
Original	Sheet No. 25	Rules and Regulations, Rule 21, Conservation Alliance Plan Mechanism
Original	Sheet No. 200	Various Miscellaneous Charges, Rate Schedule 200
Original	Sheet No. 200-A	Various Miscellaneous Charges, Rate Schedule 200 (Con't.)
47 th Revision	Sheet No. 500-A	Tax Schedule No. 500 (Continued)
42 nd Revision	Sheet No. 502	Building Construction Temporary Heating and Dry-Out Service, Schedule No. 502
47 th Revision	Sheet No. 503	Residential Service Rate, Schedule No. 503
31 st Revision	Sheet No. 504	General Commercial Service Rate, Schedule No. 504
30 th Revision	Sheet No. 505	General Industrial Service Rate, Schedule No. 505
46 th Revision	Sheet No. 511	Large Volume General Service Rate, Schedule No. 511
27 th Revision	Sheet No. 512	Compressed Natural Gas Service, Rate Schedule No. 512
44 th Revision	Sheet No. 541	Gas Air Conditioning Rate, Schedule No. 541
41 st Revision	Sheet No. 570	Interruptible Service, Schedule No. 570
38 th Revision	Sheet No. 577	Limited Interruptible Service Rate (Optional), Schedule No. 577
7 th Revision	Sheet No. 663	Distribution System Transportation Service, Schedule No. 663
4 th Revision	Sheet No. 663-A	Distribution System Transportation Service, Schedule No. 663 (Continued)
5 th Revision	Sheet No. 664	Canceling Fourth Revision Sheet No. 664, First Revision Sheet No. 664-A and Original Sheet 664-B

APPENDIX H (continued)

SUB 1/17/07

WN U-3

Original Sheet No. 200

RECEIVED
FEB. 14, 2006
WA. UT. &
TRANS. COMM.
ORIGINAL 957090

CASCADE NATURAL GAS CORPORATION

VARIOUS MISCELLANEOUS CHARGES
RATE SCHEDULE 200

(N)

APPLICABILITY:

This schedule sets forth the provisions for various charges throughout these rules and regulations. The name and amount of the charges are listed below. The rules or rate schedules to which each charge applies are in parenthesis.

I. Reconnection Charge (Rule 5):

A reconnection charge of 24 dollars (\$24.00) will be required to reestablish service between the hours of 8 a.m. and 5 p.m. on weekdays, and a reconnection charge of \$60.00 will be required to reestablish service after 5 p.m. on weekdays and on Saturdays, Sundays, and holidays, except in the case of medical emergency.

II. Disconnect Visit Charge - (Rule 5):

A disconnect charge of ten dollars (\$10.00) may be charged, whenever Cascade is required to visit a customer's address for the purpose of disconnecting service.

III. Late Payment Charge - (Rule 6 - Part A):

Unless otherwise specified in the customer's contract, a late payment charge at the rate of 1.0% per month will be applied to the customer's current bill for all unpaid balances 30 days past due.

IV. Returned Check Charge - (Rule 6 - Part D):

A returned check fee of eighteen dollars (\$18.00) may apply for any check returned from the bank unpaid.

V. Residential Excess Flow Valves - (Rule 8):

In Conjunction With The Construction Of A New Service Line:	\$ 38.00
Modifying an Existing Service Line:	
Time of Construction Crew	up to \$220.00 per hour
Cost of Materials required to open and close service connection trench, including asphalt replacement, if any.	
Installation of the Excess Flow Valve	\$ 38.00

The customer will be responsible for any future maintenance or replacement costs that may be incurred due to the excess flow value. Such cost shall be based upon time and materials, as follows:

Time of Construction Crew	up to \$220.00 per hour
Cost of Materials required to open and close service connection trench, including asphalt replacement, if any.	
Installation of replacement Excess Flow Valve, if necessary	\$ 38.00

(continued on next page)

BY AUTH. OF WASH. UTILITIES & TRANSPORTATION COMM. EXEC. SECRETARY LETTER, DATED 1/18/07, DOCKET UG-060256 (N)

By Authority of the Commission's Order 05 in Docket No. UG-060256

ISSUED January 16, 2007 EFFECTIVE January 19, 2007

ISSUED BY **CASCADE NATURAL GAS CORPORATION**
BY Jon T. Stoltz TITLE Senior Vice President
Regulatory & Gas Supply

CANCELLED by 1st Revision of Sheet No. 200 Effective July 29, 2013

APPENDIX H (continued)

RECEIVED
FEB. 14, 2006
WA. UT. &
TRANS. COMM.
ORIGINAL 957090

WN U-3 CASCADE NATURAL GAS CORPORATION	Eighth Revision Sheet No. 9 Canceling Seventh Revision Sheet No. 9	
RULES AND REGULATIONS		
<u>RULE 5 - NOTIFICATION OF AND DISCONTINUANCE OF SERVICE</u>		
The Company may or shall discontinue service for any of the following reasons and if service is discontinued for any reason listed herein below, a charge of \$24.00 during regular business hours or \$60.00 during non-business hours may be made against the customer for reconnection. (1)		
a. At the request, written or verbal, by the Customer.		
b. Non-payment of gas bill after first giving customer either eight (8) business days written notice after the delinquent date, which is fifteen (15) days following date of bill, or the discontinuance notice may be personally delivered by an employee of the utility, in which case service may not be discontinued prior to 5 p.m. of the first business day following delivery. If the delivered notice is for non-payment of a deposit, disconnection shall not be permitted prior to 5 p.m. of the sixth (6th) day following delivery. The time of discontinuance notice may be extended, at the option of the Company, depending upon the credit record of the individual customers.		
c. For use of gas for any other property or purpose than that described in the application.		
d. For willful waste of gas through improper or imperfect piping, appliances, or otherwise.		
e. For tampering with any part of any service line or meter or any other apparatus of Company. A meter tampering charge for the actual costs of damages, repairs or any additional or unusual costs or services directly related to the interference, plus the amount of unbilled gas determined to have been lost plus the applicable reconnect charges will be applied to the customers account. (N) (1) (N) (N)		
f. In case of vacation of premises by customer.		
g. For refusal of reasonable access to property to employees of the Company for the purpose of inspection of service lines or appliances, or for reading, maintaining or removal of meters.		
h. For use of gas in violation of any city ordinance, or state or federal statute applicable to the area served, or violation of rules and regulations.		
i. For resale of gas to others.		
j. For non-payment of any proper charges, including deposits.		
k. For fraudulent obtaining or use of service.		
l. For use of equipment which adversely affects the utility's service to its other customers.		
m. Under flat rate service, for increasing use of gas without approval of the utility.		
n. For failure of customer to eliminate any hazardous condition found to exist in his facilities (i.e. piping, venting, appliances, etc.)		
o. For payment of a delinquent balance with a check that is dishonored by a bank or financial institution.		
p. For failure to keep any agreed upon payment plan.		
If the Company dispatches an employee to discontinue service, an \$10.00 service charge may be assessed by the Company to cover expenses incurred. (1)		
A utility representative dispatched to disconnect service will accept payment of a delinquent account at the service address, providing the payment is in the form of a check or money order.		
Except in case of danger to life or property, no disconnection shall be accomplished on Saturday, Sunday, legal holiday, or on any other day on which service cannot be reestablished on the same or following day.		
BY AUTH. OF WASH. UTILITIES & TRANSPORTATION COMM. EXEC. SECRETARY LETTER, DATED 1/18/07, DOCKET UG-060256		
By Authority of the Commission's Order 05 in Docket No. UG-060256		
ISSUED <u>January 16, 2007</u>	EFFECTIVE <u>January 19, 2007</u>	

CANCELLED by 9th Revision of Sheet No. 9 Effective December 1, 2013

ISSUED BY CASCADE NATURAL GAS CORPORATION

BY Jan T. Stoltz TITLE Senior Vice President
Regulatory & Gas Supply

APPENDIX I

05/31/2001 14:07 206-624-7215

CASCADE NATURAL GAS

PAGE 02/11



222 FAIRVIEW AVENUE NORTH SEATTLE, WASHINGTON 98109-5312 (206) 624-3900
FACSIMILE (206) 624-7215

UG-010794 (T)
6-27-01

CNGW01-05-01

May 31, 2001

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-9022

Dear Ms. Washburn:

Cascade Natural Gas Corporation ("Cascade") encloses for filing the following tariff sheets containing a requested effective date of July 1, 2001:

- Thirty-First Revision Sheet No. 2, Canceling Sub. Thirtieth Revision Sheet No. 2**
- Fifth Revision Sheet No. 8, Canceling Fourth Revision Sheet No. 8**
- Sixth Revision Sheet No. 9, Canceling Fifth Revision Sheet No. 9**
- First Revision Sheet No. 9-A, Canceling Original Sheet No. 9-A**
- Eighth Revision Sheet No. 10, Canceling Seventh Revision Sheet No. 10**
- Seventh Revision Sheet No. 10-A, Canceling Sub. Sixth Revision Sheet No. 10-A**
- Original Sheet No. 10-B**
- Original Sheet No. 23**
- Original Sheet No. 23-A**

The purpose of this tariff filing is to update the Company's rules and regulations in accordance with revisions to the Gas Operating rules (WAC 480-90) which becomes effective on June 4, 2001. Since this filing does not involve a change in the rates to be charged to customers, no Notice to the Public has been posted.

Very truly yours,

Jon T. Stolte,
Senior Vice President,
Planning, Regulatory & Consumer Affairs

JTS:mam

attachments

We make warm neighbors

APPENDIX I (continued)

RECEIVED

MAY 31 2001

WASH. UT. & TRANS. COMM.

ORIGINAL

WN U-3

Sixth Revision Sheet No. 9

Canceling

Fifth Revision Sheet No. 9

CASCADE NATURAL GAS CORPORATION

RULES AND REGULATIONS

RULE 5 - NOTIFICATION OF AND DISCONTINUANCE OF SERVICE

The Company may or shall discontinue service for any of the following reasons and if service is discontinued for any reason listed herein below, a charge of \$16.00 during regular business hours or \$32.00 during non-business hours may be made against the customer for reconnection.

- a. At the request, written or verbal, by the Customer.
- b. Non-payment of gas bill after first giving customer either eight (8) business days written notice after the delinquent date, which is fifteen (15) days following date of bill, or the discontinuance notice may be personally delivered by an employee of the utility, in which case service may not be discontinued prior to 5 p.m. of the first business day following delivery. If the delivered notice is for non-payment of a deposit, disconnection shall not be permitted prior to 5 p.m. of the sixth (6th) day following delivery. The time of discontinuance notice may be extended, at the option of the Company, depending upon the credit record of the individual customers.
- c. For use of gas for any other property or purpose than that described in the application.
- d. For willful waste of gas through improper or imperfect piping, appliances, or otherwise.
- e. For tampering with any part of any service line or meter or any other apparatus of Company.
- f. In case of vacation of premises by customer.
- g. For refusal of reasonable access to property to employees of the Company for the purpose of inspection of service lines or appliances, or for reading, maintaining or removal of meters.
- h. For use of gas in violation of any city ordinance, or state or federal statute applicable to the area served, or violation of rules and regulations.
- i. For resale of gas to others.
- j. For non-payment of any proper charges, including deposits.
- k. For fraudulent obtaining or use of service.
- l. For use of equipment which adversely affects the utility's service to its other customers.
- m. Under flat rate service, for increasing use of gas without approval of the utility.
- n. For failure of customer to eliminate any hazardous condition found to exist in his facilities (i.e. piping, venting, appliances, etc.)
- o. For payment of a delinquent balance with a check that is dishonored by a bank or financial institution.
- p. For failure to keep any agreed upon payment plan.

If the Company dispatches an employee to discontinue service, an \$8.00 service charge may be assessed by the Company to cover (T) expenses incurred.

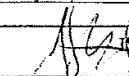
Except in case of danger to life or property, no disconnection shall be accomplished on Saturday, Sunday, legal holiday, or on any other day on which service cannot be reestablished on the same or following day.

CNG/W01-05-01

ISSUED May 31, 2001

EFFECTIVE July 1, 2001

BY


Jon T. Stoltz

ISSUED BY CASCADE NATURAL GAS CORPORATION

TITLE Senior Vice President
Planning, Regulatory & Consumer Affairs

CANCELLED by 7th Revision of Sheet 9 Effective January 1, 2005

APPENDIX J

From: Paul, Susie (UTC)
Sent: Wednesday, October 02, 2013 3:21 PM
To: Parvinen, Michael (Michael.Parvinen@cngc.com)
Subject: Request for Documentation

Hi Mike,

The commission is requesting Cascade Natural Gas provide documentation for each billing cycle for Washington state customers from Oct. 2011 through Oct. 2013. Please provide:

1. The bill date printed on the account statement for each billing cycle in Washington state, and
2. The actual mail date for each billing cycle in Washington state.

Also, on Sep. 27, you stated you would forward me the explanation of the Bellingham tax issue. To date, I have not received it. Please respond to this issue and the monthly statements dates by Oct. 9.

Please let me know if you have any questions. Thanks!

Susie Paul
Compliance Investigator
Consumer Protection and Communications
Washington Utilities and Transportation Commission
Phone: (360) 664-1105 / email: spaul@utc.wa.gov

APPENDIX K

DC1

04/15/2013 17:51:30

File:
JobID: CASCADE34A - NEW
Mode: CASCADE34A - NEW
Operator: Key Op

Total Started: 12312
Total Completed: 12284
Total Outsorted: 23
Total Restored: 0
Total Removed due to Jam: 3
Total Removed By Operator: 2
Total Left on inserter: 0

Feeder Summary - Fdr/Pages/Collations

<FpsEngine> 12284/12284
<Feeder01> 10619/10619
<Feeder02> 0/0
<Feeder03> 12284/12284
<Feeder04> 0/0
<Feeder05> 12284/12284
<Feeder06> 0/0
<Hicap_Control> 12285/12285

Bin Summary

VS1_a: VS1 17
Account: ????
Sub Account: ????

Postage Summary: (run pieces / run dollars / remaining dollars)

M1_Meter: 12284 / \$4422.240 / \$39301.104

Error Summary - Count:Condition

12264: [4680] Weight classification
7: [4638] Double feed
13: [4671] Jammed
3: [4744] Jam detected on chassis (piece hit jam wire)
20: [4691] Manually Repaired
3: [4657] Collation overrun by another
1: [4646] Lost due to jam or processing error
2: [4632] Unknown mailpiece, system could not track from input.
1: [4729] Mailpiece insertion error

Washington
Totally at a loss, all we can suspect is 4 ~~other~~ statements were printed twice
Wend Amy

APPENDIX L



In the Community to Serve®

SERVICE FOR
 [REDACTED]
 YAKIMA, WA 98908-1362

www.cngc.com

ACCOUNT NUMBER DATE DUE
 979 622 0000 8 Apr 29, 2013

BILL DATE AMOUNT DUE
 Apr 12, 2013 \$144.41

PAGE 1 of 2

ACCOUNT SUMMARY

Previous Balance \$219.09
 Payment Received 3/29/2013 Thank you -219.09
 Current Gas Charges 144.41
Amount Due on 4/29/13 \$144.41

Any balance remaining after the due date is subject to a late payment charge of 1.00% per month.

CUSTOMER SERVICE & EMERGENCY SERVICE

(888) 522-1130

Emergencies: 24 hours a day
 Non-emergencies: Mon-Fri, 7 AM - 7 PM

Email: customerservice@cngc.com
 Mail: Cascade Natural Gas Corporation,
 Attn: Customer Service, PO Box 7608, Boise, ID
 83707-1608. Please include your account number.

CALL BEFORE YOU DIG 811



Payment Due ▲
 Your payment will be automatically deducted from your bank account on or after this date.

Note: Charges for current services are due and payable upon receipt of bill and are past due as noted. This bill does not extend the due date of past bills.

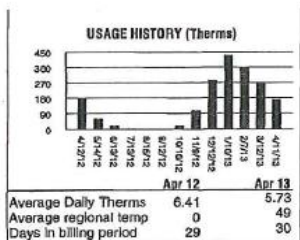
Gas Charges

BILLING PERIOD DAYS
 3/13/13 - 4/11/13 30

METER NUMBER
 472194336

METER READ DATE
 4/11/13
 Next scheduled read 5/13/13

RATE
 504 - General Commercial Service



Average Daily Therms: Apr 12: 6.41, Apr 13: 5.73

Average regional temp: Apr 12: 0, Apr 13: 49

Days in billing period: Apr 12: 29, Apr 13: 30

CURRENT READING	PREVIOUS READING	DIFFERENCE (CCF)	ENERGY FACTOR	PRESSURE FACTOR	THERMS USED
7902	7734	= 168	x 1.044492	x 0.977572	= 172

Basic Service Charge \$10.00 per month 10.00
 Delivery Charge 172 Therms x \$0.23179 39.87
 Average Cost of Gas 172 Therms x \$0.50213 86.37
 City Tax 6% 8.17

Total Gas Charges* \$144.41

*The current billing amount includes 3.852% state utility tax 5.56.

PLEASE KEEP THIS PORTION FOR YOUR RECORDS.
 PLEASE RETURN THIS PORTION WITH YOUR PAYMENT, MAKING SURE THE RETURN ADDRESS SHOWS IN THE ENVELOPE WINDOW.



ACCOUNT NUMBER
 979 622 0000 8

DATE OF BANK DRAFT
 Apr 29, 2013

AMOUNT DUE
 \$144.41

12280



[REDACTED]
 YAKIMA WA 98908-



Thank you for using the Cascade Natural Gas Corporation Automatic Payment Plan

479796220000800000144410000014441

APPENDIX M

RECEIVED
JAN. 18, 2013
WA. UT. &
TRANS. COMM.
ORIGINAL 130080

Seventy-Fourth Revision Sheet No. 500
Canceling
Seventy-Third Revision Sheet No. 500

WN U-3

CASCADE NATURAL GAS CORPORATION

TAX SCHEDULE NO. 500

A. TAX ADDITIONS

APPLICABILITY:

This schedule applies to gas service and rental of equipment rendered by the Company within the State of Washington in territory specified herein and under its tariff schedules and contracts for service which specifically refer to this schedule. It is designed to be in addition to such schedules and contracts to offset any exaction upon or in respect to the manufacture, purchase, transmission, distribution or sale of gas service or the conduct of such business or any part thereof, by the Company. The charges otherwise payable by the customer under the tariff schedules or contracts specifically referring to this Tax Schedule shall be increased with all bills issued for meter readings on or after the Effective Date shown, by the appropriate Tax Addition and shall be applied to revenues as defined by each respective municipality.

RATE:

Municipality or Tax Jurisdiction:	Ordinance No.	Effective Date	Tax Addition		Limited to
			Gas Service	Rental Equipment	
Aberdeen	5632	10/01/86	6.0%	6.0%	No Limit
Anacortes	2659	06/01/04	4.67%		No Limit
		01/01/05	5.34%		No Limit
		01/01/06	6.00%		No Limit
		03/01/05	6.0%		No Limit
Arlington	1357	03/01/05	6.0%		No Limit
Bellingham	9376	01/01/91	6.0%	6.0%	First \$250,000 per month per customer. Portion in excess of \$250,000 per month.
			and 1.0%		
Blaine	1791	01/06/86	6.0%	6.0%	No Limit
Bremerton	4346	12/03/91	6.0%	6.0%	No Limit
Burlington	459 & 1243	02/09/94	3.0%	3.0%	No Limit
Castle Rock	2009-17	02/01/10	6.0%	6.0%	Does not apply to portion in excess of \$500 in any month where used primarily for manufacturing.
College Place	888	01/12/03	6.0%	6.0%	No Limit
East Wenatchee	2008-13	02/01/09	6.0%	6.0%	No Limit
Elma	685 & 856	10/01/89	6.0%		First \$250 per month per customer
Everson	355	02/01/88	6.0%	6.0%	No Limit
Ferndale	1277	01/07/02	6.0%	6.0%	No Limit
Grandview	1650	05/01/03	7.5%	7.5%	No Limit (expires 04/30/05)
			6.0%	6.0%	
Granger	581	01/01/84	6.0%	6.0%	No Limit
Hoquiam	88-14	11/01/88	6.0%	6.0%	No Limit
Kalama	779	03/02/91	6.0%		Does not apply to portion in excess of \$1,000 in any month where used for manufacturing.
Kelso	3020	01/01/91	6.0%	6.0%	No Limit
Kennewick	2806, 3303, 3612	07/01/95	8.5%	8.5%	No Limit
La Conner	712	06/13/98	6.0%	6.0%	No Limit
Longview	2227	01/01/91	6.0%	6.0%	Does not apply to portion in excess of \$1,000 in any month where used for manufacturing.

CNG/W13-01-01

ISSUED January 18, 2013

EFFECTIVE March 1, 2013

ISSUED BY CASCADE NATURAL GAS CORPORATION

BY Michael Parvinen TITLE Director
Regulatory Affairs

APPENDIX N



In the Community to Serve®

8113 W. GRANDRIDGE BLVD., KENNEWICK, WASHINGTON 99336-7166
TELEPHONE 509-734-4500 FACSIMILE 509-737-7166
www.cngc.com

January 18, 2013

Mr. David Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: Advice No. CNG/W13-01-01

Dear Mr. Danner:

Enclosed, Cascade Natural Gas Corporation herewith submits for filing the following revised tariff sheet to its WN U-3 Tariff. The revised tariff sheet contains an effective date of March 1, 2013.

Seventy-Fourth Revision Sheet No. 500 Canceling Seventy-Third Revision Sheet No. 500

The tariff sheet provides for the following change:

The tariff revision will allow Cascade to pass through tax assessments by municipalities to ratepayers on a going forward basis. Cascade's tariffs currently do not allow for such a recovery. This filing has been prompted by the Commission's recent action in Docket UE-121439 in which Puget Sound Energy proposed and was granted a similar tariff revision.

If you have any questions regarding this filing, please contact me at 509-734-4593.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Parvinen", with a long horizontal flourish extending to the right.

Michael Parvinen
Director, Regulatory Affairs

Enclosure

APPENDIX O



In the Community to Serve®

SERVICE FOR [REDACTED]
BELLINGHAM, WA 98226-7737

www.cngc.com

ACCOUNT NUMBER
887 732 6668 4

BILL DATE
Mar 15, 2013

PAGE 1 of 2
TOTAL AMOUNT DUE
\$470.96
includes past due amount

PAST DUE Your bill includes a past due amount.
Reminder If you have recently made payment, thank you.

ACCOUNT SUMMARY

Previous Balance	\$354.75
Payments Received <i>No payment received</i>	-0.00
Past Due Amount Due Now	\$354.75
Miscellaneous Charges	4.26
Current Gas Charges	111.95
Amount Due	\$470.96

Any balance remaining after the due date is subject to a late payment charge of 1.00% per month.

CUSTOMER SERVICE & EMERGENCY SERVICE

(888) 522-1130

Emergencies: 24 hours a day
Non-emergencies: Mon-Fri, 7 AM - 7 PM
Email: customerservice@cngc.com
Mail: Cascade Natural Gas Corporation,
Attn: Customer Service, PO Box 7606, Boise, ID
83707-1606. Please include your account number.

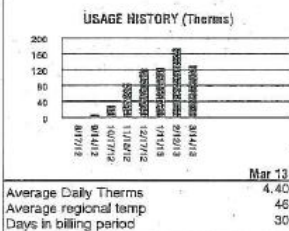
CALL BEFORE YOU DIG **811**

Payment Due ▼	
PAST DUE AMOUNT	\$354.75 <i>Due NOW</i>
CURRENT CHARGES	116.21 <i>Due 4/1/13</i>
TOTAL AMOUNT DUE	\$470.96

Note: Charges for current services are due and payable upon receipt of bill and are past due as noted. **This bill does not extend the due date of past bills.**

Gas Charges

BILLING PERIOD DAYS
2/13/13 - 3/14/13 30
METER NUMBER
472179995
METER READ DATE
3/14/13
Next scheduled read 4/15/13
RATE
503 - Residential Service



Average Daily Therms 4.40
Average regional temp 46
Days in billing period 30

CURRENT READING	PREVIOUS READING	DIFFERENCE (CCF)	ENERGY FACTOR	PRESSURE FACTOR	THERMS USED
9759	9635	= 124	x 1.058289	x 1.002672	= 132

Gas Charges - CONTINUED

Basic Service Charge \$4.00 per month	4.00
Delivery Charge 132 Therms x \$0.26248	34.65
Average Cost of Gas 132 Therms x \$0.50442	66.59
City Tax 6.383%	6.72
Total Gas Charges*	\$111.95
Late Payment Charge	4.00
City Tax 6.383% x \$4.00	0.26
Ending Total Gas Charges	\$116.21

**The current billing amount includes 3.852% state utility tax 4.31.*

PLEASE KEEP THIS PORTION FOR YOUR RECORDS.

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT, MAKING SURE THE RETURN ADDRESS SHOWS IN THE ENVELOPE WINDOW.

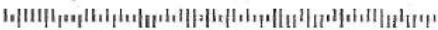


ACCOUNT NUMBER
887 732 6668 4

Your account is PAST DUE

Has your mailing address or phone number changed? Check here and provide details on back.

PAST DUE AMOUNT	CURRENT CHARGES	TOTAL AMOUNT DUE
\$354.75 <i>Due NOW</i>	\$116.21 <i>Due Apr 7, 2013</i>	\$470.96



[REDACTED]
BELLINGHAM WA 98226-7737

Please enter amount enclosed

\$

PO BOX 990065
BOISE ID 83799-0065

Write account number on check and make payable to CNGC.

47887732666840000047096000032296

APPENDIX P



CITY OF BELLINGHAM

Finance Department • City Hall • 210 Lottie Street • P. O. Box V
Bellingham, WA 98227 • Phone (360) 778-8000 • Fax (360) 778-8001

**PAYMENT IS
DUE:**

01/31/2014

OCCUPATIONAL / ADMISSIONS / GAMBLING TAX RETURN

TAX PERIOD 12/1/2013 - 12/31/2013

CITY ACCOUNT NO.	030070	<i>Please contact us Prior to filling out return. You have a very large credit on your account</i>
Business Name	Cascade Natural Gas	Bus. Phone (360) 733-6980
Business Location	1600 IOWA ST BELLINGHAM, WA 98229	Bus. Fax (509) 737-9834
Mailing Address	ATTN: TAX DEPT CASCADE NATURAL GAS 8113 W GRANDRIDGE BLVD KENNEWICK, WA 99336-7166	Start Date 1/21/1991
		SIC Code 4923001
		Rate Type OGM
		Business Type 0000

If business is no longer active, please enter closing date here and return to address above:

Description of Business Natural Gas Transmission And Distribution			
Ownership	Corporation	Email Address	service@cngc.com
WA State UBI No.	578012249	Federal ID No.	
		Approximate Floor Area used for the Business:	sq. ft.

UPDATE BELOW NAMES OF OWNERS, PARTNERS, OR CORPORATE OFFICERS - Attach additional page if necessary

Owner Name	CASCADE NATURAL GAS CORPORATION	Title		Phone	(206) 624-3900
Home Address	222 FAIRVIEW AVE N, SEATTLE, WA 98109			Cell Phone	
Social Security No.		Drivers License No			
Owner Name		Title		Phone	
Home Address				Cell Phone	
Social Security No.		Drivers License No			

Emergency Contact

Name	Title	Phone No.
Address		Cell Phone No.

Alarm Company

Name	License No
Address	Phone No.

PLEASE CALCULATE AMOUNT DUE BY ENTERING INFORMATION IN BOXES BELOW AND SIGN

• Renewal Message •

OCCUPATION TAX--GAS

Please enter your gross receipts in the box at the right and calculate your tax as follows:

Multiply your gross receipts by 0.06 *←*

Enter the amount due in the "Tax Due" box at the right.

If this return is past due, add a penalty of 1% of the tax due for each month delinquent.

Gross Receipts	\$	<input style="width: 100%;" type="text"/>
Less Allowable Deductions	\$	<input style="width: 100%;" type="text"/>
Taxable Amount	\$	<input style="width: 100%;" type="text"/>
Tax Due	\$	<input style="width: 100%;" type="text"/>
Penalties	\$	<input style="width: 100%;" type="text"/>
<i>credit</i> Previous Balance	\$	<input style="width: 100%; text-align: right; border-bottom: 1px solid black;" type="text" value="(18730.21)"/>
TOTAL AMOUNT DUE	\$	<input style="width: 100%;" type="text"/>

I certify, under penalty of perjury, that I have examined this return and any accompanying schedules and statements, and to the best of my knowledge and belief, it is a true, correct and complete return.

Signature of Owner or Representative _____ Title: _____ Date: _____

RETURN COMPLETED TAX RETURN TO ABOVE ADDRESS AND MAKE CHECK PAYABLE TO CITY OF BELLINGHAM

APPENDIX Q

CITY OF BELLINGHAM, WASHINGTON
Finance Department, 210 Lottie Street, Bellingham, Washington 98225
Telephone: (360) 676-6900 FAX (360) 738-7351
Lynn Carpenter, Director

City of Bellingham
Finance Director
P.O. Box V
Bellingham, Wa. 98227

FOR YOUR ACCOUNT NUMBER 00001-10-00-01: GAS

GROSS RECEIPTS:	<u>1,796,731.03</u>
TAX RATE:	<u>6.383%</u>
TAX:	<u>114,685.34</u>
GROSS RECEIPTS:	<u>-</u>
TAX RATE:	<u>1.010%</u>
TAX:	<u>-</u>
OUTSTANDING BALANCE	<u>0</u>
LATE CHARGE:	<u>0</u>
TOTAL AMOUNT REMITTED:	<u>114,685.34</u>

I HEREBY SWEAR AND AFFIRM THAT THE INFORMATION CONTAINED ABOVE IS FULL,
TRUE AND CORRECT

SIGNED: _____

TITLE: Tax Analyst

DATE: 05/03/13

APPENDIX R



8113 W. GRANDRIDGE BLVD., KENNEWICK, WASHINGTON 99336-7166
TELEPHONE 509-734-4500 FACSIMILE 509-737-7166
www.cngc.com

March 31, 2014

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

RE: Replacement Sheet for UG-140459
Advice No. CNG/W14-03-01

Dear Mr. King:

Cascade Natural Gas Corporation herewith submits substitute filing the following revised tariff sheet to its WN U-3 Tariff. Please do not re-docket.

The substitute tariff sheet provides for the following change:

In the footnote (1), we changed the word to "billable" instead of "effective". Per staff request, this change is being made to our original filing which was made March 21, 2014.

Any questions regarding this filing may be directed to me at (509) 734-4593.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Parvinen", with a long horizontal flourish extending to the right.

Michael Parvinen
Director, Regulatory Affairs

Attachment

In the Community to Serve®

APPENDIX S

SUB 3/31/14

RECEIVED
MAR. 21, 2014
WA. UT. &
TRANS. COMM.
ORIGINAL

140459

Seventy-Fifth Revision Sheet No. 500
Canceling
Seventy-Fourth Revision Sheet No. 500

WN U-3

CASCADE NATURAL GAS CORPORATION

TAX SCHEDULE NO. 500

A. TAX ADDITIONS

APPLICABILITY:

This schedule applies to gas service and rental of equipment rendered by the Company within the State of Washington in territory specified herein and under its tariff schedules and contracts for service which specifically refer to this schedule. It is designed to be in addition to such schedules and contracts to offset any exaction upon or in respect to the manufacture, purchase, transmission, distribution or sale of gas service or the conduct of such business or any part thereof, by the Company. The charges otherwise payable by the customer under the tariff schedules or contracts specifically referring to this Tax Schedule shall be increased with all bills issued for meter readings on or after the Effective Date shown, by the appropriate Tax Addition and shall be applied to revenues as defined by each respective municipality.

RATE:

Municipality or Tax Jurisdiction:	Ordinance No.	Effective Date	Tax Addition		Limited to
			Gas Service	Rental Equipment	
Aberdeen	5632	10/01/86	6.0%	6.0%	No Limit
Anacortes	2659	06/01/04	4.67%		No Limit
		01/01/05	5.34%		No Limit
		01/01/06	6.00%		No Limit
Arlington	1357	03/01/05	6.00%		No Limit
Bellingham (1)	9376	01/01/91	6.383%	6.383%	First \$250,000 per month per customer.
		and	1.01%		Portion in excess of \$250,000 per month.
Blaine	1791	01/06/86	6.0%	6.0%	No Limit
Bremerton	4346	12/03/91	6.0%	6.0%	No Limit
Burlington	459 & 1243	02/09/94	3.0%	3.0%	No Limit
Castle Rock	2009-17	02/01/10	6.0%	6.0%	Does not apply to portion in excess of \$500 in any month where used primarily for manufacturing.
College Place	888	01/12/03	6.0%	6.0%	No Limit
East Wenatchee	2008-13	02/01/09	6.0%	6.0%	No Limit
Elma	685 & 856	10/01/89	6.0%		First \$250 per month per customer
Everson	355	02/01/88	6.0%	6.0%	No Limit
Ferndale	1277	01/07/02	6.0%	6.0%	No Limit
Grandview	1650	05/01/03	7.5%	7.5%	No Limit (expires 04/30/05)
	1650	05/01/05	6.0%	6.0%	No Limit
Granger	581	01/01/84	6.0%	6.0%	No Limit
Hoquiam	88-14	11/01/88	6.0%	6.0%	No Limit
Kalama	779	03/02/91	6.0%		Does not apply to portion in excess of \$1,000 in any month where used for manufacturing.
Kelso	3020	01/01/91	6.0%	6.0%	No Limit
Kennewick	2806, 3303, 3612	07/01/95	8.5%	8.5%	No Limit
La Conner	712	06/13/98	6.0%	6.0%	No Limit
Longview	2227	01/01/91	6.0%	6.0%	Does not apply to portion in excess of \$1,000 in any month where used for manufacturing.

(1) The rate established by Ordinance is 6% up to \$250,000 plus 1% over \$250,000, however, the City of Bellingham's definition of gross revenue includes this tax and, therefore, the billable rate to customers must be adjusted to also include the effect of applying the tax rate to the taxes.

- Continued on Next Page -

CNG/W14-03-01

ISSUED March 21, 2014

EFFECTIVE May 1, 2014

ISSUED BY **CASCADE NATURAL GAS CORPORATION**
 BY Michael Parvinen TITLE Director
Michael Parvinen Regulatory Affairs

APPENDIX T

From: [Parvinen, Michael](#)
To: [Paul, Susie \(UTC\)](#)
Subject: RE: Request for Documentation
Date: Tuesday, October 08, 2013 4:59:06 PM

Cascade did not directly inform customers; we just corrected the bills even though it took a couple of months to get it right. We also did not receive any customer complaints on the issue.

From: Paul, Susie (UTC) [<mailto:SPaul@utc.wa.gov>]
Sent: Tuesday, October 08, 2013 4:55 PM
To: Parvinen, Michael
Subject: RE: Request for Documentation

Thanks, Mike. You told me that CNG did not self-report the error to the commission; did CNG inform customers of the error or the correction? And, lastly, did CNG receive customer complaints regarding the error? Thanks.

Susie Paul

Compliance Investigator
Consumer Protection and Communications
Washington Utilities and Transportation Commission
Phone: (360) 664-1105 / email: spaul@utc.wa.gov

From: Parvinen, Michael [<mailto:Michael.Parvinen@cngc.com>]
Sent: Tuesday, October 08, 2013 4:48 PM
To: Paul, Susie (UTC)
Subject: RE: Request for Documentation

Susie,

Here is the description of the Bellingham tax issue and how it related to late pay fees.

Effective on March 1 the Commission approved a language change on Schedule 500 (municipal tax schedule) allowing the company to charge differently for Municipal Taxes in Bellingham per the city's interpretation of the language in the city ordinance. With the implementation of this change, the Late Pay Charge calculation inadvertently started rounding the late pay fee calculation to the nearest dollar within the Customer Information System. The problem was realized on March 14. The company decided to reverse the late payment fees for all charges that rounded up and recalculate the correct amount. The programming effort to reverse and correct the algorithms for rebilling took the rest of March and April to complete so the correction showed on the May billing.

We are still determining what information we have to reply to requests 1 and 2. I'll let you know tomorrow if we will need more time.

Mike

APPENDIX U

From: [Parvinen, Michael](#)
To: [Paul, Susie \(UTC\)](#)
Subject: Customers affected by the Late Pay Fee last March
Date: Wednesday, February 05, 2014 3:45:15 PM

Susie,

Here's the numbers and dates. The error started on March 1st it was fixed in the system on March on March 22nd. 582 late fees on bills rounded down during this period and were not corrected. 929 late pay fees rounded up so those were reversed and subsequently corrected in May.

Hope this helps.

Mike Parvinen

Director, Regulatory Affairs



Tel: 509-734-4593
Cell: 509-528-9223
Email: michael.parvinen@cngc.com

APPENDIX V



SERVICE FOR
[REDACTED]
 SUNNYSIDE, WA 98944-2234

ACCOUNT NUMBER
 466 850 2710 7

PAGE 1 of 2

BILL DATE
 Mar 7, 2013

TOTAL AMOUNT DUE
\$408.37
includes past due amount

In the Community to Serve®

www.cngc.com

PAST DUE Reminder *Your bill includes a past due amount. If you have recently made payment, thank you.*

ACCOUNT SUMMARY

Previous Balance	\$535.70
Payment Received 2/14/2013 Thank you	-250.00
Past Due Amount Due Now	\$285.70
Miscellaneous Charges	3.00
Current Gas Charges	119.67
Amount Due	\$408.37

Any balance remaining after the due date is subject to a late payment charge of 1.00% per month.

CUSTOMER SERVICE & EMERGENCY SERVICE

(888) 522-1130
 Emergencies: 24 hours a day
 Non-emergencies: Mon-Fri, 7 AM - 7 PM
 Email: customerservice@cngc.com
 Mail: Cascade Natural Gas Corporation,
 Attn: Customer Service, PO Box 7608, Boise, ID
 83707-1608. Please include your account number.

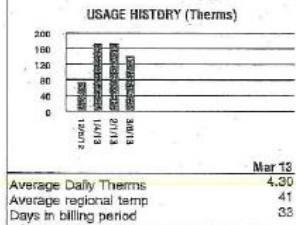
Payment Due	
PAST DUE AMOUNT	\$285.70 <i>Due NOW</i>
CURRENT CHARGES	122.67 <i>Due 3/25/13</i>
TOTAL AMOUNT DUE	\$408.37

CALL BEFORE YOU DIG **811**

Note: Charges for current services are due and payable upon receipt of bill and are past due as noted. **This bill does not extend the due date of past bills.**

Gas Charges

BILLING PERIOD 2/2/13 - 3/6/13
DAYS 33
METER NUMBER 472131149
METER READ DATE 3/6/13
Next scheduled read 4/9/13
RATE 503 - Residential Service



Gas Charges - CONTINUED

Basic Service Charge \$4.00 per month	4.00
Delivery Charge 142 Therms x \$0.26248	37.27
Average Cost of Gas 142 Therms x \$0.50442	71.63
City Tax 6%	6.77

Total Gas Charges*	\$119.67
Late Payment Charge	3.00
Ending Total Gas Charges	\$122.67

**The current billing amount includes 3.852% state utility tax 4.61.*

CURRENT READING	PREVIOUS READING	DIFFERENCE (CDF)	ENERGY FACTOR	PRESSURE FACTOR	THERMS USED
9119	8984	= 135	x 1.063864	x 0.987072	= 142

PLEASE KEEP THIS PORTION FOR YOUR RECORDS.
 PLEASE RETURN THIS PORTION WITH YOUR PAYMENT, MAKING SURE THE RETURN ADDRESS SHOWS IN THE ENVELOPE WINDOW.



ACCOUNT NUMBER
 466 850 2710 7

Your account is PAST DUE

Has your mailing address or phone number changed? Check here and provide details on back.

PAST DUE AMOUNT	CURRENT CHARGES	TOTAL AMOUNT DUE
\$285.70 Due NOW	\$122.67 Due Mar 25, 2013	\$408.37



SUNNYSIDE WA 98944-2234

PO BOX 990065
 BOISE ID 83799-0065

Please enter amount enclosed
 \$
 Write account number on check and make payable to CNGC.

474668502710700000408370000023037

APPENDIX W



SERVICE FOR
[REDACTED]
 SUNNYSIDE, WA 98944-2234

ACCOUNT NUMBER
 466 850 2710 7

PAGE 1 of 2

BILL DATE
 May 8, 2013

TOTAL AMOUNT DUE
\$532.04
includes past due amount

In the Community to Serve™

www.cngc.com

PAST DUE Your bill includes a past due amount.
Reminder If you have recently made payment, thank you.

ACCOUNT SUMMARY

Previous Balance	\$480.09
Payments Received <i>No payment received</i>	-0.00
Late Payment Charge	-3.00
Past Due Amount Due Now	\$477.09
Miscellaneous Charges	7.63
Current Gas Charges	47.32
Amount Due	\$532.04

Any balance remaining after the due date is subject to a late payment charge of 1.00% per month.

CUSTOMER SERVICE & EMERGENCY SERVICE

(888) 522-1130

Emergencies: 24 hours a day
 Non-emergencies: Mon-Fri, 7 AM - 7 PM
 Email: customerservice@cngc.com
 Mail: Cascade Natural Gas Corporation,
 Attn: Customer Service, PO Box 7606, Boise, ID
 83707-1606. Please include your account number.

CALL BEFORE YOU DIG 811

Payment Due ▾	
PAST DUE AMOUNT	\$477.09
<i>Due NOW</i>	
CURRENT CHARGES	\$4.95
<i>Due 5/24/13</i>	
TOTAL AMOUNT DUE	\$532.04

Note: Charges for current services are due and payable upon receipt of bill and are past due as noted. **This bill does not extend the due date of past bills.**

Gas Charges - CONTINUED

Basic Service Charge \$4.00 per month	4.00
Delivery Charge 53 Therms x \$0.25248	13.61
Average Cost of Gas 53 Therms x \$0.50442	26.73
City Tax 6%	2.66

Total Gas Charges* **\$47.32**

Late Payment Charge **2.85**

Late Payment Charge **4.77**

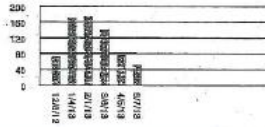
Ending Total Gas Charges **\$54.95**

*The current billing amount includes 3.852% state utility tax 1.82.

Gas Charges

BILLING PERIOD 4/6/13 - 5/7/13
 DAYS 32
 METER NUMBER 472131149
 METER READ DATE 5/7/13
 Next scheduled read 6/6/13

USAGE HISTORY (Therms)



RATE	May 13
503 - Residential Service	1.56
Average Daily Therms	54
Average regional temp	32
Days in billing period	32

CURRENT READING	PREVIOUS READING	DIFFERENCE (CCF)	ENERGY FACTOR	PRESSURE FACTOR	THERMS USED
9247	9195	= 52	x 1.033553	x 0.987072	= 53

PLEASE KEEP THIS PORTION FOR YOUR RECORDS.

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT, MAKING SURE THE RETURN ADDRESS SHOWS IN THE ENVELOPE WINDOW.



ACCOUNT NUMBER
 466 850 2710 7

Your account is PAST DUE

Has your mailing address or phone number changed? Check here and provide details on back.

PAST DUE AMOUNT	CURRENT CHARGES	TOTAL AMOUNT DUE
\$477.09	\$54.95	\$532.04
Due NOW	Due May 24, 2013	

SUNNYSIDE WA 98944-2234

PO BOX 990065
 BOISE ID 83799-0065

Please enter amount enclosed

\$

Write account number on check and make payable to CNGC.

474666502710700000532040008035404

APPENDIX X

Sub. First Rev. Sheet No. 500-B
Canceling
Original Sheet No. 500-B

RECEIVED
MAY. 5, 2006
WA. UT. &
TRANS. COMM.
ORIGINAL

WN U-3

CASCADE NATURAL GAS CORPORATION

TAX SCHEDULE NO. 500
(Continued from previous page)

B. FEDERALLY RECOGNIZED INDIAN NATION TAX CREDIT

(T)

APPLICABILITY:

This schedule applies to gas service rendered by the Company within the State of Washington in territory specified herein and under its tariff schedules and contracts for service, which specifically refer to this tax schedule. The charges otherwise payable by the customer under the tariff schedules or contracts specifically referring to this Tax Additions Schedule shall be decreased with all bills issued for meter readings on or after the effective date shown.

In accordance with WAC 458-20-192, (7) (b), the rates and charges specified in this tariff shall be reduced for all Federally Recognized Indian Nation tribal and member accounts, located and service provided within the boundaries of a Federally Recognized Indian Nation. Each applicable customer must apply on an individual account basis to Cascade to receive this tax credit.

(T)
|
(T)

FEDERALLY RECOGNIZED INDIAN NATION TAX ADJUSTMENT

(T)
|
(T)

The Federally Recognized Indian Nation Tax Credit is designed to offset the Washington State Public Utility Tax, which is a part of the rates charged for core market natural gas service.

State Public Utility Tax Credit (3.852%)

C. STATE UTILITY TAX EXEMPTION CREDIT

(N)

APPLICABILITY:

This schedule applies to gas service rendered by the Company within the State of Washington in territory specified herein and under its tariff schedules and contracts for service, which specifically refer to this tax schedule. The charges otherwise payable by the customer under the tariff schedules or contracts specifically referring to this Tax Additions Schedule shall be decreased with all bills issued for meter readings on or after the effective date shown.

To the extent the Washington Department of Revenues authorizes exemptions of public utility tax collection from certain customer groups, the rates and charges specified in this tariff shall be reduced by a State Utility Tax credit. Each applicable customer must apply on an individual account basis to Cascade to receive this tax credit.

STATE UTILITY TAX ADJUSTMENT

The State Utility Tax Credit is designed to offset the Washington State Public Utility Tax, which is a part of the rates charged for core market natural gas service.

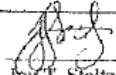
State Public Utility Tax Credit (3.852%)

(N)

CNG/W06-05-01

ISSUED May 5, 2006

EFFECTIVE June 5, 2006

BY 
Joel T. Stoltz

ISSUED BY CASCADE NATURAL GAS CORPORATION

TITLE Senior Vice President
Regulatory & Gas Supply

APPENDIX Z



SERVICE FOR
 ██████████
 TOPPENISH, WA 98948-1138

ACCOUNT NUMBER
 424 751 0000 6

PAGE 1 of 2

BILL DATE
 Jan 16, 2014

TOTAL AMOUNT DUE
\$222.81
includes past due amount

In the Community to Serve

www.cngc.com

PAST DUE Your bill includes a past due amount.
Reminder if you have recently made payment, thank you.

ACCOUNT SUMMARY

Previous Balance	\$65.47
Payments Received <i>No payment received</i>	-0.00
Past Due Amount Due Now	\$65.47
Miscellaneous Charges	0.65
Current Gas Charges	156.69
Amount Due	\$222.81

Any balance remaining after the due date is subject to a late payment charge of 1.00% per month.

CUSTOMER SERVICE & EMERGENCY SERVICE

(888) 522-1130

Emergencies: 24 hours a day
 Non-emergencies: Mon-Fri, 7 AM - 7 PM
 Email: customerservice@cngc.com
 Mail: Cascade Natural Gas Corporation,
 Attn: Customer Service, PO Box 7608, Boise, ID
 83707-1608. Please include your account number.

CALL BEFORE YOU DIG **811**

Payment Due ▼	
PAST DUE AMOUNT	\$65.47 <i>Due NOW</i>
CURRENT CHARGES	157.34 <i>Due 2/3/14</i>
TOTAL AMOUNT DUE	\$222.81

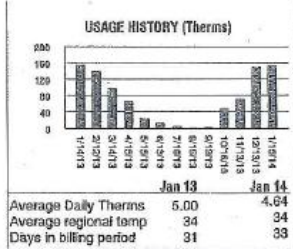
Note: Charges for current services are due and payable upon receipt of bill and are past due as noted. **This bill does not extend the due date of past bills.**

Gas Charges

BILLING PERIOD DAYS
 12/14/13 - 1/15/14 33

METER NUMBER
 472572090

METER READ DATE
 1/15/14
Next scheduled read 2/13/14



RATE
 503 - Residential Service

Average Daily Therms	5.00	4.64
Average regional temp	34	34
Days in billing period	31	33

Gas Charges - CONTINUED

Basic Service Charge \$4.00 per month	4.00
Delivery Charge 153 Therms x \$0.26632	40.75
Average Cost of Gas 153 Therms x \$0.66175	101.25
City Tax 8.5%	12.41
State Utility Tax Credit -0.852%	-5.10
Indian Nation Tribal Charge 3%	4.38
Total Gas Charges*	\$156.69
Late Payment Charge	0.65
Ending Total Gas Charges	\$157.34

CURRENT READING	PREVIOUS READING	DIFFERENCE (CF)	ENERGY FACTOR	PRESSURE FACTOR	THERMS USED
5551	5408	= 143	x 1.077829	x 0.990472	= 153

PLEASE KEEP THIS PORTION FOR YOUR RECORDS.

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT, MAKING SURE THE RETURN ADDRESS SHOWS IN THE ENVELOPE WINDOW.



ACCOUNT NUMBER
 424 751 0000 6

Your account is PAST DUE

Has your mailing address or phone number changed? Check here and provide details on back.

PAST DUE AMOUNT	CURRENT CHARGES	TOTAL AMOUNT DUE
\$65.47 Due NOW	\$157.34 Due Feb 3, 2014	\$222.81



██████████
 TOPPENISH WA 98948-1138

PO BOX 990065
 BOISE ID 83799-0065

Please enter amount enclosed

\$

Write account number on check and make payable to CNGC.

474247510000600000222810000022281