

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

TREE TOP, INC.,)	DOCKET UG-210745
)	
Complainant,)	DECLARATION OF CHAD STOKES IN
)	SUPPORT OF COMPLAINANT’S
v.)	RESPONSE IN OPPOSITION TO
)	RESPONDENT’S MOTION FOR
CASCADE NATURAL GAS)	SUMMARY DETERMINATION
CORPORATION,)	
)	
Respondent.)	
)	
)	
)	
)	

I, Chad Stokes, declare under penalty of perjury under the laws of the State of Washington:

1. I am an attorney licensed in the State of Oregon, OSB No. 004007 and the State of Washington, WSBA No. 37499.
2. I am a partner of the law firm of Cable Huston, LLP in Portland, Oregon and counsel of record for Tree Top, Inc. (“Tree Top”) in the above-captioned matter.
3. On April 5, 2021, I attempted to contact Michael Parvinen at Cascade to discuss the overrun entitlement penalties. Mr. Parvinen did not respond.¹
4. On April 8, 2021, I attempted to contact Mr. Parvinen a second time. Mr. Parvinen again failed to respond.²
5. One April 12, 2021, I attempted to reach Cascade a third time.³

¹ See Attachment 1, page 2 of 3.
² *Id.*
³ *Id.* at page 1 of 3.

6. On April 14, 2021, I had a telephone conference with Mr. Parvinen regarding the overrun entitlement penalty.⁴ During that call, Mr. Parvinen disclosed to me that Cascade did not purchase gas from the Green River hub in Wyoming during the overrun entitlement period. Mr. Parvinen agreed to discuss treatment of the overrun entitlement penalties internally and follow up with me. I also forwarded to Mr. Parvinen an order from the Idaho Public Utility Commission where it approved a reduction in an overrun entitlement penalty when neither the utility nor its customers were harmed by a customer's overrun entitlement.⁵
7. On April 30, 2021, Mr. Parvinen informed me by email that it is not taking any action to reduce the entitlement penalty assessed, even though "Cascade's core customers may not have been harmed or incurred costs to the levels of the penalties."⁶
8. Attachment 3 to this Declaration contains a true and correct copy of "Public Service Commission," of Title LXX, "Railroads and Public Utilities" of the 1915 code."

DATED in Portland, Oregon, this 6th day of January, 2022.

CABLE HUSTON LLP



Chad M. Stokes, WSB 37499, OSB 004007
Cable Huston LLP
1455 SW Broadway, Suite 1500
Portland, OR 97201
Telephone: (503) 224-3092
E-mail: cstokes@cablehuston.com

Attorneys for Tree Top, Inc.

⁴ *Id.*

⁵ *See* Attachment 2, page 1 of 2.

⁶ *Id.*

PAGE - 2 - DECLARATION OF CHAD STOKES IN SUPPORT OF COMPLAINANT'S
RESPONSE IN OPPOSITION TO RESPONDENT'S MOTION FOR SUMMARY
JUDGMENT