BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Washington Utilities and Transportation) Docket NO. UG-060256
Commission,)
Complainant,)
) NW Energy Coalition's support
V.) for Public Counsel's Motion to
) Compel Supplementation of Cascade's
Cascade Natural Gas Corporation,) General Rate Case Filing Pursuant to
Respondent.) WAC 480-07-500 and WAC 480-07-510

The NW Energy Coalition (NWEC) supports Public Counsel's petition to the Washington

Utilities and Transportation Commission (WUTC) to compel Cascade Natural Gas Corporation (Cascade) to supplement its initial filing in the above captioned docket. NWEC will focus considerable but not sole attention on Cascade Natural Gas Company's proposed investments in conservation and low income rate assistance. NWEC notes inadequacies in Cascade's initial filing

in these two example issue areas. The examples are reflective rather than exhaustive and the NWEC supports Public Counsel's request that Cascade supplement the entire record in accordance

with the WUTC's rules.

The information provided on proposed conservation expenditures in Cascade's initial filing is insufficient - -particularly in light of Cascade's statement in Exhibit JTS-1T, page 25, that "Energy efficiency and conservation are the most viable near-term tactics for getting natural gas prices under control. It's also a vital strategy for stabilizing the cost of gas over the long term." Given the viable and strategic nature of conservation and energy efficiency investments,

is critical that Cascade provide information that informs the public review of its proposal to spend

\$150,000 on conservation.

Similarly, the proposed \$800,000 expenditure for low income assistance is unsupported in

the filing. Additionally, proposed rate designs and changes to specific fees and charges will influence significantly investments in energy efficiency and low income customer's ability to pay

for Cascade's services. In its initial filing (JTS-1T, pages 15-18 as example), Cascade notes that proposed changes in rates for disconnection visits, fees for returned checks and a late payment charge will make "the subsidy paid by other customers much smaller" but does not indicate the impact these changes will have on low income customers.

As Public Counsel notes in Section F of its motion, the filing of data requests is an inadequate remedy for the lack of information included in Cascade's initial filing. If Cascade does

not supplement its initial filing, the company's "burden of proof" is shifted to the public, information included in data requests will not directly be entered in the record, and the opportunity

for parties to examine the reasons for and impacts of Cascade's proposals is significantly reduced.

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