

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS CORPORATION,  
(Advice No. CNG/W15-06-01),

Respondent.

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In the Matter of the Petition of

CASCADE NATURAL GAS CORPORATION

For a Waiver from WAC 480-07-505 –  
General Rate Proceedings.

Docket No. UG-151309

**CASCADE NATURAL GAS  
CORPORATION’S MOTION FOR  
PERMISSION TO FILE REPLY TO  
NWIGU AND PUBLIC COUNSEL  
ANSWER AND OBJECTION TO  
PETITION OF CASCADE NATURAL  
GAS CORPORATION FOR WAIVER  
AND THE ENERGY PROJECT’S  
ANSWER AND OBJECTION TO  
CASCADE NATURAL GAS  
PETITION FOR WAIVER**

1. Cascade Natural Gas Corporation (“Cascade”) submits this Motion for Permission to File Reply to the Answer and Objection to Petition of Cascade Natural Gas Corporation for Waiver filed by Northwest Industrial Gas Users (“NWIGU”) and the Public Counsel Unit of the Washington State Attorney’s Office (“Public Counsel”)<sup>1</sup> and the Answer and Objection to Cascade Natural Gas Petition for Waiver filed by the Energy Project.<sup>2</sup> NWIGU, Public Counsel and Energy Project will be collectively referred to as “Respondents.” Permission is appropriate because the Respondents’

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<sup>1</sup> Northwest Industrial Gas Users and the Public Counsel Unit of the Washington State Attorney’s Office Answer and Objection to Petition of Cascade Natural Gas Corporation for Waiver (July 9, 2015).

<sup>2</sup> The Energy Project’s Answer and Objection to Cascade Natural Gas Petition for Waiver (July 10, 2015).

Answers raise new arguments and issues and Cascade's Reply will shed light on matters raised by the Respondents. Cascade has separately filed its proposed reply ("Reply") with the Washington Utilities and Transportation Commission (the "Commission").

2. The Commission's rules do not provide for an automatic reply to an answer; however a party may file a reply with authorization from the Commission, upon a showing of cause.<sup>3</sup> A motion for permission to reply is due within five business days after an answer is served.<sup>4</sup> This motion for permission to reply is timely filed. A motion for permission to reply should address whether the answer raises new material requiring a response, or other reasons why a reply is necessary.<sup>5</sup>
3. The Respondents have raised several factual and legal arguments that were not previously addressed by Cascade and which require a response. Cascade seeks permission to file its Reply to address two fundamental issues. First, the Respondents assert that Cascade did not comply with the waiver requirements as required by WAC 480-07-110(2)(a) and that the granting of the waiver is contrary to the public interest. Second, the Respondents parties assert WAC 480-07-505(1)(b) is applicable to this proceeding even though that rule does not apply to Cascade's rate request.
4. Cascade's Reply corrects the record on these critical issues. As detailed in the Reply, Cascade complied with the waiver requirements of WAC 480-07-110(2)(a) and WAC 480-07-505(1)(b) is not applicable. Furthermore, Cascade has filed its Reply simultaneously with its Motion for Permission to Reply and therefore the acceptance and consideration of Cascade's Reply will not delay the Commission's review of the Cascade's underlying request or the Respondents' Answers.

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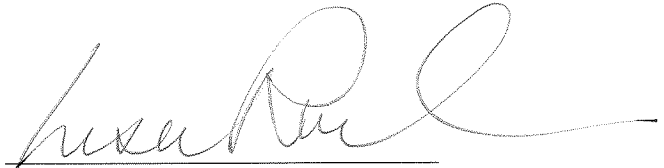
<sup>3</sup> WAC 480-07-370(d)(i).

<sup>4</sup> WAC 480-07-370(d)(ii).

<sup>5</sup> WAC 480-07-370(d)(ii).

5. Accordingly, good cause exists for the Commission to grant permission for the Reply.<sup>6</sup> For the foregoing reasons, Cascade respectfully requests that the Commission grant permission for the filing of the attached Reply.

Respectfully submitted,



Lisa Rackner  
McDowell Rackner & Gibson PC  
419 SW 11th Ave., Suite 400  
Portland, OR 97205  
Phone: (503)595-3925  
Fax: (503)595-3928  
Email: [lisa@mcd-law.com](mailto:lisa@mcd-law.com)

Attorneys for Cascade

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<sup>6</sup> WAC 480-07-370(d)(i).