

**Exh. MCC-6
Docket UG-170929
Witness: Melissa Cheesman**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**CASCADE NATURAL GAS
CORPORATION,**

Respondent.

DOCKET UG-170929

**EXHIBIT TO
TESTIMONY OF**

Melissa Cheesman

**ON BEHALF OF STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Cascade's Response to UTC Staff Data Request No. 87

February 15, 2018

Cascade Natural Gas Corporation
Washington Utilities and Transportation Commission
WUTC v. Cascade Natural Gas Corporation (2017 General Rate Case)
Docket UG-170929

Request No. 87

Date prepared: 12/4/2017

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UTC STAFF DATA REQUEST NO. 87:
RE: Load Study Compliance

In Order 04 of Docket UG-152286, the Commission approved of the parties' settlement agreement. The Commission summarized part of that agreement, as follows: "Prior to filing its next general rate case, Cascade must initiate a load study to determine the class core responsibilities for the amount of gas that the Company distributes on a daily basis to each local service area." *Wash. Utils. & Transp. Comm'n v. Cascade Natural Gas Corp.*, Docket UG-152286, Order 04, ¶ 7 (July 7, 2016).

The Company's witness, Brian Robertson, responds to the question "**Does Cascade currently have the equipment in place to use meter/loggers to provide daily measurements?**" by stating "No. Due to Cascade's geographically dispersed and noncontiguous distribution service area, implementing meter/loggers would prove to be expensive and difficult to do." Exh. BR-1T at 8:10-13.

- a. Please explain what the Company means by "expensive." Please provide all data to support the Company's determination of "expensive."
- b. Please explain what the Company means by "difficult." Please provide all data to support the Company's determination of "difficult."
- c. Please provide the Company's most recent load study. This should include but not be limited to: the beginning and ending dates of the data collection period, all analysis and results, any on-going analysis, and project completion date.

Response:

The Company was only required to initiate a load study for this rate case. To initiate the logger/meters analysis the company started with discussions with other LDCs. Conversations with Puget Sound Energy lead us to believe it would be cost-prohibitive at this time based on LDCs like NW Natural and PSE having more urban profiles vs our

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more rural profile. The Company discussed with WUTC Staff about using the forecast model to create a load study which would determine the class core responsibilities for the amount of gas that the Company distributes on a daily basis to each local service area. As indicated in WUTC-62 response the load study will not be completed until April 30, 2018. The forecast model used in the 2016 Washington IRP has been provided in response to WUTC-78.