

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS COMPANY.

Respondent.

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DOCKET UG-240008

**STEFAN DE VILLIERS  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT SDV-9**

Cascade's Response to Public Counsel Data Request No. 105, Attachment A &  
Revised Response to Public Counsel Data Request No. 1, Attachment B

**September 25, 2024**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UG-240008  
Cascade Natural Gas Corporation  
2024 General Rate Case**

**PUBLIC COUNSEL DATA REQUEST NO. 105:**

**Re: Cascade's Response to PC-1, Attachments A and C**

Please provide new versions of Attachment A and Attachment C, expanding the scope to provide similar data for all years from 2014 through 2023. Provide these new versions in the same electronic spreadsheet format as Attachments A and C.

**Response:**

Attached as Attachments A and B "240008-CNGC-Resp-PC DR-105-Attach A.xlsx" and "240008-CNGC-Resp-PC DR-105-Attach B.xlsx" to Cascade Natural Gas Corporation's ("Cascade") Response to Public Counsel Data Request No. 105, please find 2014-2023 data similar to that which was provided in Attachments A and C to Cascade's Response to Public Counsel Data Request No. 01.

Please note, in Attachment B "240008-CNGC-Resp-PC DR-105-Attach B.xlsx" to Cascade's Response to Public Counsel Data Request No. 105, the contributions in aid of construction ("CIAC") amounts presented for 2015 are not representative of a typical year or a trend. In 2015, it was discovered that the income tax gross-ups on the CIACs had historically been recorded as a reduction to plant, rather than recording the gross-up as income. Therefore, a reclassification was made in December 2015 to correct the presentation of the historical recording of the income tax gross-ups.

**ATTACHMENT A to Cascade's Response  
to PUBLIC COUNSEL Data Request  
No. 105**

Main and Service Line Extension Investment Amounts 2014-2023

Sum of Amount Row Labels	Column Labels 2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	Grand Total
CNG-G-Mains-New GR - FP	\$1,517,294.17	\$8,461,474.17	\$12,699,296.65	\$13,296,899.15	\$9,312,803.17	\$11,203,131.31	\$10,772,944.26	\$7,836,351.20	\$2,988,545.06	\$4,663,418.38	\$82,752,157.52
CNG-G-Services-New GR - FP	\$3,914,808.07	\$6,450,267.90	\$4,400,252.55	\$9,446,166.87	\$13,111,444.79	\$13,457,857.37	\$10,059,562.55	\$8,087,352.01	\$7,034,406.59	\$5,908,813.51	\$81,870,932.21
<b>Grand Total</b>	<b>\$5,432,102.24</b>	<b>\$14,911,742.07</b>	<b>\$17,099,549.20</b>	<b>\$22,743,066.02</b>	<b>\$22,424,247.96</b>	<b>\$24,660,988.68</b>	<b>\$20,832,506.81</b>	<b>\$15,923,703.21</b>	<b>\$10,022,951.65</b>	<b>\$10,572,231.89</b>	<b>\$164,623,089.73</b>

**The Excel 'Data' Tab has been removed due to its voluminous size - it is being provided in electronic format only**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UG-240008  
Cascade Natural Gas Corporation  
2024 General Rate Case**

**PUBLIC COUNSEL DATA REQUEST NO. 01:**

**Re: Line Extension Allowances**

For each residential (Rate Schedule 503) line extension since 2019, including planned line extensions, please provide in an Excel workbook:

- a. The total cost of the line extension (including forecasted costs, if necessary) disaggregated by expense type.
- b. The cost of the line extension (including forecasted costs, if necessary):
  - i. Funded by the customer.
  - ii. Not funded by the customer (include how costs are recovered, any applicable rate spread, and methodology).
- c. The census block of the customer.
- d. The expected annual usage of the customer.
- e. The date in service, or planned date in service, of the line extension.
- f. Whether the customer has ever been a part of the Company's CARES or WEAFF programs.

**First Revised Response:**

On June 21, 2024, Cascade Natural Gas Corporation ("Cascade") met with Public Counsel to discuss this and other Public Counsel data requests and explain Cascade's limitations in providing the data requested. In that meeting, Cascade explained that it would respond to this request to the best of its ability within the limitations discussed in this response.

As explained in the June 21, 2024, meeting with Public Counsel, Cascade does not track its line extension investments by customer or rate schedule. Additionally, while Cascade does have the ability to identify main and service line investments related to customer growth (i.e., line extension), it cannot identify other line extension investments (e.g. meters, regulators, etc.) as specifically relating to customer growth.

Regarding planned main line and service line extension investments in 2024 and 2025, Cascade does not forecast these projects on a customer-by-customer basis. For a discussion of how Cascade forecasted main and service line investments related to growth, please see the Direct Testimony of Eric P. Martuscelli, Exh. EPM-1T, page 22, lines 4-19, and page 23, lines 1-2, for main line investments, and page 24, lines 5-21, for service line investments.

Despite Cascade's inability to fully respond to this data request, Cascade responds as follows to Public Counsel Data Request No. 01:

- a. Attached as Attachment A "240008-CNGC-Resp-PC DR-01-Attach A.xlsx" to Cascade's First Revised Response to Public Counsel Data Request No. 01, please find an Excel file containing the total main and service line extension investment amounts, net of contributions from customers, closed to Cascade's plant accounts between 2020-2023. Attached as Attachment B "240008-CNGC-First Rev Resp-PC DR-01-Attach B.xlsx" to Cascade's First Revised Response to Public Counsel Data Request No. 01, please find an Excel file containing the planned main and service line extension investment amounts for 2024 and 2025. Attachment B to Cascade's First Revised Response to Public Counsel Data Request No. 01 removes a projected main line reinforcement investment, which was inadvertently included in the original Attachment B.
- b.
  - i. Attached as Attachment C "240008-CNGC-Resp-PC DR-01-Attach C.xlsx" to Cascade's First Revised Response to Public Counsel Data Request No. 01, please find an Excel file containing the total amount of customer contributions towards line extension costs closed to Cascade's plant accounts between 2020-2023. In response to a question raised by Public Counsel in the June 21, 2024, meeting, Cascade confirms that contributions from customers that are applied to main line investments are not split between main and service line investments when both are required for a line extension project.
  - ii. Please note, the amount not funded by the customer represents the investment that Cascade made, which can be found in Attachment A. Line extension investments are included in Cascade's rate base and revenue requirement calculations, and thus are recovered through Cascade's base rates. During a rate case, line extension investments are allocated to the different rate schedules based on Cascade's cost of service study.
- c. As explained above, Cascade does not track its line extension investments by customer or rate schedule. However, the town location for the main and service line extension investments between 2020-2023 is provided in Attachment A.
- d. For Rate Schedule 503, the expected annual usage is 648 therms, which is calculated based on the 54 average monthly therm usage amount listed in the currently effective Rule 8 – Extension of Distribution Facilities tariff, times 12 months.

For Rate Schedule 504, the expected annual usage is 3,252 therms, which is calculated based on the 271 average monthly therm usage amount listed in the currently effective Rule 8 – Extension of Distribution Facilities tariff, times 12 months.

Expected annual usage for customers taking service on schedules other than 503 and 504 is determined on a case-by-case basis.

- e. Attachment A provides the year and month the main and service line extension investment amounts were closed to Cascade's plant accounts between 2020-2023. Attachment B provides the year and month the main and service line extension investment amounts are planned to close to Cascade's plant accounts between 2024-2025.
- f. As explained above, Cascade does not track its line extension investments by customer or rate schedule. Additionally, many line extension projects are for developments where individual customers are not identified. For these reasons, this information cannot be provided.



**ATTACHMENT B to Cascade's First  
Revised Response to PUBLIC COUNSEL  
Data Request  
No. 01**

## 2024-2025 Planned Main and Service Line Extension Investment

Function	Funding Project	Description	FERC Account No.	WA 2024 Cascade Plant Additions	WA 2024 Estimated In-Service Date	WA 2025 Cascade Plant Additions	WA 2025 Estimated In-Service Date
Gas Distribution	FP-317628	MAIN-GROWTH-WALLA WALLA DISTRICT	376.3	\$ 87,599	12/31/2024	\$ 90,059	12/31/2025
Gas Distribution	FP-317630	SERV-GROWTH-WALLA WALLA DISTRICT	380.3	\$ 432,803	12/31/2024	\$ 444,940	12/31/2025
Gas Distribution	FP-317632	MAIN-GROWTH-WENATCHEE DISTRICT	376.3	\$ 14,539	12/31/2024	\$ 14,512	12/31/2025
Gas Distribution	FP-317634	SERV-GROWTH-WENATCHEE DISTRICT	380.3	\$ 54,195	12/31/2024	\$ 58,743	12/31/2025
Gas Distribution	FP-317636	MAIN-GROWTH-YAKIMA DISTRICT	376.3	\$ 102,138	12/31/2024	\$ 104,991	12/31/2025
Gas Distribution	FP-317638	SERV-GROWTH-YAKIMA DISTRICT	380.3	\$ 674,852	12/31/2024	\$ 693,785	12/31/2025
Gas Distribution	FP-317640	MAIN-GROWTH-ABERDEEN DISTRICT	376.3	\$ 167,041	12/31/2024	\$ 171,725	12/31/2025
Gas Distribution	FP-317642	SERV-GROWTH-ABERDEEN DISTRICT	380.3	\$ 266,466	12/31/2024	\$ 273,939	12/31/2025
Gas Distribution	FP-317644	MAIN-GROWTH-BELLINGHAM DISTRICT	376.3	\$ 808,876	12/31/2024	\$ 802,352	12/31/2025
Gas Distribution	FP-317646	SERV-GROWTH-BELLINGHAM DISTRICT	380.3	\$ 1,278,711	12/31/2024	\$ 1,314,531	12/31/2025
Gas Distribution	FP-317648	MAIN-GROWTH-BREMERTON DISTRICT	376.3	\$ 910,308	12/31/2024	\$ 989,922	12/31/2025
Gas Distribution	FP-317650	SERV-GROWTH-BREMERTON DISTRICT	380.3	\$ 1,179,968	12/31/2024	\$ 1,213,060	12/31/2025
Gas Distribution	FP-317652	MAIN-GROWTH-LONGVIEW DISTRICT	376.3	\$ 6,250	12/31/2024	\$ 20,140	12/31/2025
Gas Distribution	FP-317654	SERV-GROWTH-LONGVIEW DISTRICT	380.3	\$ 344,511	12/31/2024	\$ 354,173	12/31/2025
Gas Distribution	FP-317656	MAIN-GROWTH-MT VERNON DISTRICT	376.3	\$ 502,438	12/31/2024	\$ 574,644	12/31/2025
Gas Distribution	FP-317658	SERV-GROWTH-MT VERNON DISTRICT	380.3	\$ 1,103,684	12/31/2024	\$ 1,123,493	12/31/2025
Gas Distribution	FP-317750	MAIN-GROWTH-KENNEWICK DISTRICT	376.3	\$ 1,222,712	12/31/2024	\$ 1,161,648	12/31/2025
Gas Distribution	FP-317752	SERV-GROWTH-KENNEWICK DISTRICT	380.3	\$ 1,692,514	12/31/2024	\$ 1,739,981	12/31/2025
Gas Distribution	FP-321983	GR; 2" PE; VIEW; 6,000'	376.3	\$ 20,447	1/15/2024		
Gas Distribution	FP-323431	GR L'view -2" HP MN, Divert INC RNG	376.2	\$ 237,522	11/28/2024		
				\$ 11,107,573		\$ 11,146,637	
			Mains	\$ 4,079,869		\$ 3,929,993	
			Services	\$ 7,027,704		\$ 7,216,644	
			Total	\$ 11,107,573		\$ 11,146,637	