**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 WEAF 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:

1. 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.  
   1. 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.
2. 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.
3. 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.
4. 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.

1. 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.
2. 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 A to Cascade’s First Revised Response to PUBLIC COUNSEL Data Request**

**No. 01**

**ATTACHMENT B to Cascade’s First Revised Response to PUBLIC COUNSEL Data Request**

**No. 01**

**ATTACHMENT C to Cascade’s First Revised Response to PUBLIC COUNSEL Data Request**

**No. 01**