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November 18, 2010

**SENT VIA E-MAIL AND ABC LEGAL MESSENGER**

David Danner  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
P. O. Box 47250  
Olympia, Washington 98504-7250

Re: In the Matter of the Petition of CASCADE NATURAL GAS CORPORATION,  
for an accounting order authorizing deferred accounting treatment of loss in margin due  
to Company sponsored conservation programs, or, in the alternative, the continuation of  
the pilot decoupling mechanism that was approved in Docket UG-060256  
Docket No. UG-101656

Dear Mr. Danner:

Enclosed for filing in the above-referenced docket are the originals and twelve (12) copies of  
Public Counsel Comments in Response to Notice and the Certificate of Service for filing in the  
above mentioned docket.

Sincerely,

Simon J. Ffitch  
Senior Assistant Attorney General  
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SJf:cjw

cc: Service List (First Class & Email) (Incorporates UG-060256 Service List)

**CERTIFICATE OF SERVICE**

**Docket No. UG-101656**

I hereby certify that a true and correct copy of Public Counsel Comments in Response to Notice in the above mentioned docket number was sent to each of the parties of record shown below in sealed envelopes, via: First class mail, and electronic mail.

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DATED: November 18, 2010.

  
CAROL WILLIAMS  
Legal Assistant