BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,  Complainant,  v.  CASCADE NATURAL GAS CORPORATION,  (Advice No. CNG/W15-06-01),  Respondent.  . . . . . . . . . . . . . . . . . . . . . . . . . . . . . . . . . .  In the Matter of the Petition of  CASCADE NATURAL GAS CORPORATION  For a Waiver from WAC 480-07-505 –  General Rate Proceedings. | DOCKET UG-151309  **CASCADE NATURAL GAS CORPORATION’S REPLY TO NWIGU AND PUBLIC COUNSEL ANSWER AND OBJECTION TO PETITION OF CASCADE NATURAL GAS CORPORATION FOR A MOTION FOR WAIVER AND TO THE ENERGY PROJECT’S ANSWER AND OBJECTION TO CASCADE NATURAL GAS PETITION FOR WAIVER** |

1. **INTRODUCTION**
2. Cascade Natural Gas Corporation (“Cascade”) submits this Reply to the Answer and Objection to Petition of Cascade for a Motion for Waiver filed by Northwest Industrial Gas Users (“NWIGU”) and the Public Counsel Unit of the Washington State Attorney’s Office (“Public Counsel”)[[1]](#footnote-1) and the Answer and Objection to Cascade Natural
3. Contrary to the Respondents arguments, the plain meaning of restructure as utilized in WAC 480-07-505, is not the same thing as increase. Cascade’s overall request to increase rates by 1.59% that when equally applied to all customer classes results in a 6.28% increase to transportation customers does not trigger a GRC. That interpretation of the statute is consistent with the plain meaning of WAC 480-07-505, the Commission’s order addressing 480-07-505, and previous filings made by Public Counsel.
4. **CONCLUSION**
5. For the reasons stated above and in its June 23, 2015 filing, Cascade respectfully requests:
6. The Commission grant Cascade’s Petition for a Motion for Waiver of WAC 480-07-505(1)(c); and
7. The Commission determine that WAC 480-07505(1)(b) is not applicable to this proceeding.

Respectfully submitted,

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1. 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). [↑](#footnote-ref-1)