

REVISED: July 21, 2015
BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS
CORPORATION,
(Advice No. CNG/W15-06-01),

Respondent.

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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**

I. INTRODUCTION

1. 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 and the Answer and Objection to Cascade Natural

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).

21. 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.

II. CONCLUSION

22. For the reasons stated above and in its June 23, 2015 filing, Cascade respectfully requests:

- (1) The Commission grant Cascade's Petition for a Motion for Waiver of WAC 480-07-505(1)(c); and
- (2) The Commission determine that WAC 480-07505(1)(b) is not applicable to this proceeding.

Respectfully submitted,



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