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April 29, 2019

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities & Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

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COMMISSION

RE: UE-170002 & UG-170003 Notice of Informal Draft Rules

Cascade Natural Gas Corporation (“Cascade” or “Company”) hereby submits the following questions for your consideration in the UE-170002 and UG-170003 conference call to be held on April 30, 2019 at 9:30 A.M. regarding the draft cost of service rules. The Company felt it would be beneficial to send these questions in advance to help facilitate the conversation during the conference call.

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- 2. With reference to the proposed input data types, what is meant by “the rate schedule usage data for any cost of service study” in WAC 480-xxx-060 (1)?
- What is considered an “approved cost of service study on file with the Commission”?
  - Would it be appropriate to use the most recently filed study in a closed docket?

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Natural Gas Scenarios

- Distribution mains Classification
  - How does a 4CP method apply to gas mains classification?
  - 1. The peak and average method described in the NARUC Gas Distribution Rate Design Manual is a “Method of Allocation of Demand of Capacity Costs” (page 26, section 4), not a classification method.
- Distribution Mains Allocation
  - How does a 4CP method apply to gas mains allocation?
  - 1. Clarify the current staff method: Does the current Staff method use 15 peak days? (5 each from the last 3 years) Or is it the 5 peak days in the last 3 years, or 5 peaks?

If you have any questions regarding these questions, please feel free to call me at (509) 734-4593.

Sincerely,

/s/ Michael Parvinen

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Attachment