



222 FAIRVIEW AVENUE N., SEATTLE WASHINGTON 98109-5312 206-624-3900  
FACSIMILE 206-654-4039  
www.cngc.com

Dave Danner, Executive Director & Secretary  
Washington Utilities and Transportation Commission  
1300 S Evergreen Park Drive SW  
Post Office Box 47250  
Olympia, Washington 98504-7250

**Re: U-100522, Cascade Natural Gas Corporation's Statement of Issues**

Dear Mr. Danner:

Cascade Natural Gas Corporation (Cascade) provides the following Statement of Issues in the above referenced docket established for investigating conservation incentive mechanisms and declines in revenues due to various reasons, including conservation programs.

The Company believes that the following issues should be considered:

- What are the impacts of caps and limitations on recovery mechanisms and at what point do such limitations mitigate a utility's incentive to promote conservation.
- Should mechanism standards and guidelines apply universally to all Washington utilities or should they be adaptable to individual utility needs retaining best practices from mechanisms already in existence?
- Should recovery mechanisms include rate adjustments on an individual customer basis based on customer usage history or based on the entire customer class?
- Should the WUTC consider system limitations associated with certain decoupling approaches when developing new regulations and standards?

The company appreciates the Commission's consideration of our issues and we look forward to participating in future meetings and workshops as these issues are discussed.

Sincerely,

Katherine Barnard  
Manager, Regulatory & Gas Supply

*"In The Community To Serve"*