

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS  
CORPORATION,

Respondent.

DOCKET UG-170929

COMMISSION STAFF'S  
REQUEST FOR OPPORTUNITY TO  
RESPOND TO BENCH REQUEST  
NO. 1, PROPOSING MARCH 23, 2018  
FOR SUBMISSION

**I. INTRODUCTION**

1 Commission Staff (Staff) of the Washington Utilities and Transportation  
Commission (Commission) submits this request for an opportunity to respond pursuant to  
WAC 480-07-375(b).

**II. RELIEF REQUESTED**

2 Staff requests that the Commission grant it the opportunity to respond to the  
Company's response and supplemental response to the Commission's Bench Request No. 1.

**III. STATEMENT OF FACTS**

3 On August 31, 2017, Cascade Natural Gas Corporation ("Cascade" or "the  
Company") filed revisions to tariff WN U-3.

4 On September 14, 2017, the Commission issued a complaint and order suspending  
the Company's tariff revisions ("Order 01").

5           On October 10, 2017, the Commission issued a prehearing conference order and  
notice of hearing (Order 03”). Order 03 set March 23, 2018 as the date for cross-answer  
testimony.

6           On December 22, 2017, President Trump signed H.R.1 – An Act to provide for  
reconciliation pursuant to titles II and V of the concurrent resolution on the budget for fiscal  
year 2018 (“The Tax Cuts and Jobs Act” or “TCJA”) into law.

7           On January 3, 2018, the Commission issued Bench Request No. 1, requesting the  
Company to provide information related to the TCJA’s impacts on the Company’s revenue  
requirement and the Company’s proposed ratemaking treatments(s) for those impacts.

8           On January 12, 2018, the Company submitted a response to Bench Request No. 1.

9           On January 29, 2018, the Company submitted a supplemental response to Bench  
Request No. 1.

#### **IV. STATEMENT OF ISSUES**

10          Whether Staff should be granted the opportunity to respond to the Company’s  
response and supplemental response to the Commission’s Bench Request No. 1.

#### **V. ARGUMENT**

11          The Commission’s administrative rules specifically provide for procedural motions  
to “request establishment of or modifications to process or the procedural schedule in a  
proceeding.” WAC 480-07-375(b). In this case, the Commission directed Bench Request  
No. 1 to the Company affording it an opportunity to present how the TCJA impacted the  
Company’s revenue requirement in this case and propose ratemaking treatment for those  
impacts. The Company took that opportunity and, additionally, took an opportunity to file a  
supplemental response two weeks after the Commission’s initial deadline for response.

Other parties to the case were not afforded an opportunity to respond to the bench request. Staff makes its request on its own behalf, but would support allowing other parties to the case to also provide a response to the Company's bench request response and supplemental response.

12           Staff has, now, been able to review and understand the Company's response and supplemental response to the Commission's bench request, and is prepared to offer a response to the Company's submission. The impacts of the TCJA can be difficult to understand and as Staff has studied the issues involved its understanding has developed. After reviewing the Company's supplemental response filed on January 29, 2018, Staff now believes it understands the Company's presentation of the impacts in this case and will be able to provide a helpful response for the Commission's consideration. Staff believes that allowing it, and other non-Company parties, to respond to the Company's bench request response will aid the Commission in its decision regarding the impacts of the TCJA and how those impacts should be addressed.

13           To this end, Staff requests that the Commission allow it to submit a response to the Company's bench request response by March 23, 2018. This date is the same as that for the filing of cross-answer testimony. This is reasonable and fair because it coincides with this procedural date and would, therefore, not require the extension of the procedural schedule or the addition of another filing deadline. Additionally, it provides a reasonable amount of time, within the current procedural framework, to respond to the Company's bench request response.

## VI. CONCLUSION

14 Commission Staff respectfully asks that the Commission grant its request to afford it an opportunity to respond to the Company's response and supplemental response to the Commission's Bench Request No. 1 by March 23, 2018, three weeks from the filing of this request.

DATED this 2nd day of March 2018.

Respectfully submitted,

ROBERT W. FERGUSON  
Attorney General

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Counsel for Washington Utilities and  
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