

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS  
CORPORATION

Respondent.

Docket No. UG-170929

CASCADE NATURAL GAS  
CORPORATION'S RESPONSE TO  
COMMISSION STAFF'S REQUEST  
TO RESPOND TO BENCH  
REQUEST NO. 1

**I. INTRODUCTION**

1           In accordance with WAC 480-07-375(4), Cascade Natural Gas Corporation  
("Cascade" or "Company") submits to Washington Utilities and Transportation Commission  
("Commission") this response to Commission Staff's ("Staff") request for an opportunity to  
respond to Bench Request No. 1 ("Request"). Cascade does not object to Staff's Request and  
does not object to Staff's proposed filing date of March 23, 2018, provided that Cascade is  
also afforded an opportunity to file a reply to any response filed. Cascade proposes that the  
filing date for its reply should be April 10, 2018.

**II. STATEMENT OF FACTS**

2           Cascade agrees with the Statement of Facts as described in paragraphs 3 through 9 of  
Staff's Request.

**II. RESPONSE TO STAFF'S REQUEST**

3           Staff has requested that it be granted an opportunity to respond to Bench Request No.  
1, and notes that it makes the request on its own behalf but would not object to other parties  
also being allowed an opportunity to respond. Cascade does not object to Staff (or other

parties) being granted the opportunity to respond to Bench Request No. 1, provided that Cascade also be granted an opportunity file a reply to any response by Staff or others. It is appropriate to allow Cascade an opportunity to file a reply because (1) Cascade has the burden of proof in this case, (2) Cascade will provide additional information regarding any proposals offered by Staff and other parties that will assist the Commission in determining the proper treatment of the impacts of the Tax Cuts and Jobs Act (“TCJA”), and (3) the proposed timing for Cascade’s reply will not further delay this proceeding.

4            *First*, in accordance with RCW 80.04.130(4), the public service company seeking revisions to its rates has the burden of proof in a general rate case, and Cascade bears the burden of proof in this case. Cascade provided its initial and supplemental responses to Bench Request No. 1, but to date, Staff has not formally provided a response to Cascade’s proposed treatment of impacts of the TCJA. Cascade anticipates that Staff will provide a substantive proposal regarding the impacts of the TCJA, to which Cascade should be allowed an opportunity to respond. Because of Staff’s proposed timing for filing a response to the Bench Request No. 1 on March 23, 2018 to coincide with the filing of the Company’s rebuttal testimony, Cascade will not otherwise have an opportunity to respond to Staff’s proposed treatment of the impacts of the TCJA. Because Cascade bears the burden of proof in this proceeding, Cascade should be granted the opportunity to reply to Staff’s tax related proposals.

5            *Second*, the information that Cascade will provide in its reply will be useful to the Commission to determine the appropriate treatment of tax impacts. Because of the complexity of the issues associated with the impacts of the TCJA, it is essential that the Commission develop a complete record on these issues. Cascade’s reply will provide

Cascade's perspective on any policy, practical, or technical issues associated with TCJA proposals from Staff or other parties.

6            *Third*, Cascade's proposed timing for filing a reply, April 10, 2018, allows enough time for Cascade to review and consider Staff's proposal and falls before the deadline for discovery, and will not delay these proceedings. The Commission can approve Cascade's request without making further modifications to the procedural schedule.

### III. CONCLUSION

7            For the reasons set forth above, Cascade respectfully requests that if the Commission grants Staff's request for an opportunity to respond to Bench Request No. 1 on March 23, 2018, that Cascade also be granted an opportunity to reply on April 10, 2018.

Respectfully submitted this 7<sup>th</sup> day of March, 2018.

*/s/ Jocelyn Pease*

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