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January 29, 2025

Oregon Public Utility Commission  
Attn: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

RE: Cascade O25-01-01  
Rule 19, Conservation Alliance Plan Mechanism

Cascade Natural Gas Corporation (Cascade or Company) submits the following revision to its Tariff P.U.C. OR No. 10, stated to become effective with service on and after March 19, 2025:

Second Revision of Sheet No. 19.1

The purpose of this filing is to revise the stated term in Rule 19, Conservation Alliance Plan Mechanism such that the mechanism will be reviewed September 20, 2029, with any proposed changes to be effective on January 1, 2030. This revision is consistent with the letter Cascade filed in Docket UG 287 on December 23, 2024, which stated that Cascade had complied with the current term in the tariff, initiating a review on September 30, 2024. Since parties did not seek to revise the mechanism, Cascade now files to extend the term for continued systematic review in another five years.

Please direct any questions regarding this filing to me at (208) 377-6015 or Zach Harris at (208) 870-2476.

Sincerely,

*/s/ Lori Blattner*

Lori Blattner  
Director, Regulatory Affairs  
Cascade Natural Gas Corporation  
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Attachment

**RULE 19**  
**CONSERVATION ALLIANCE PLAN MECHANISM**

**APPLICABLE**

The Conservation Alliance Plan (CAP) mechanism described in this rule applies to customers served on Residential General Service Rate Schedule 101 and Commercial General Service Rate Schedule 104.

**TERM**

The Company shall initiate a review of this mechanism on September 20, 2029, with any proposed changes to be effective January 1, 2030.

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**PURPOSE**

The purpose of this provision is to (a) define the procedures for the annual tracking revisions in rates due to changes in the weather-normalized use per customer associated with Rate Schedule 101 & Rate Schedule 104; and (b) to define the procedures for the deferral of differences experienced between the actual average use per customer and the amount estimated at the time the Margin Rates were established.

**REVISIONS TO COMMODITY MARGIN RATES DUE TO CHANGES IN THE WEATHER-NORMALIZED USE/CUSTOMER**

1. The Company shall use the baseline weather normalized average commodity margin per customer for Rate Schedule 101 and Rate Schedule 104 as reflected in its General Rate Case, docketed as UG 347. That application was based upon the weather-normalized, twelve months ending December 31, 2017.
2. For each subsequent year for the term of this provision, the Company shall file annually (CAP Filing) with the Commission to update the Commodity Margin Rate for Rate Schedule 101 and Rate Schedule 104 based upon the weather normalized usage for the twelve months ending June 30th divided into the margin requirement of each rate schedule.
3. Weather-normalized usage is calculated using the approach to weather normalization adopted in the Company's Spring Earnings Review filings, PGA Applications and other weather normalized report submittals.
4. The Total Commodity Margin Requirement of Rate Schedule 101 and Rate Schedule 104 shall be calculated by multiplying the baseline average commodity margin per customer per Rate Schedule, excluding any margin collected through the monthly Basic Service Charge, by the current twelve months ended June 30 average customer count based upon the average of the monthly bills issued.
5. The Margin Commodity Rate is calculated by dividing the Total Commodity Margin Requirement by the Total Weather Normalized Usage.

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