

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UG-24008
Cascade Natural Gas Corporation
2024 General Rate Case**

BENCH REQUEST NO. 1:

Paragraph 34 of the Full Multiparty Settlement Stipulation outlines the settling parties' agreement to tariff revisions to phase out natural gas line extension allowances to zero by March 1, 2027, for residential and commercial rate schedules 503 and 504. In settlement testimony, Staff explains that the phase out of the proposed line extension allowances are in the public interest because the allowances are reduced based on the Net Present Value (NPV) methodology, and do not eliminate the Company's ability to offer line extensions but rather "just eliminate those extensions to new customers to be subsidized by allowances paid for by other rate payers."¹

On November 5, 2024, Washington Ballot Initiative I-2066 was approved by the citizens of Washington. Section (4)13 of the Initiative prohibits the Commission from approving with or without conditions, a multi-year rate plan, that "authorizes a gas company or large combination utility to require a customer to involuntarily switch fuel use either by restricting access to natural gas service or by implementing planning requirements that would make access to natural gas service cost-prohibitive." As this was not addressed in the settling parties' testimony, we request this conflict be addressed.

Specifically, the Commission requests that the parties provide concise briefing addressing how the Commission should consider paragraph 34 of the settlement stipulation following passage of I-2066, specifically Section 4(13) of the Initiative, together with the broader Climate Commitment Act. Please limit briefs to no more than 10 pages.

RESPONSE: See attached Brief.

¹ *Washington Utilities and Transportation Commission (W.U.T.C) v. Cascade Natural Gas Corp.*, Docket UG-240008, Exh. JHJ-1T, at pg. 14, line 15-23 (December 11, 2024).