

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS  
CORPORATION,

Respondent.

DOCKETS UG-240008

REQUEST FOR PAYMENT OF FUND  
GRANT OF THE ENERGY PROJECT

Pursuant to the Washington Extended Interim Participatory Funding Agreement (Funding Agreement),<sup>1</sup> approved by the Washington Utilities and Transportation Commission (Commission) in Docket U-210595, and Order 04 Approving Proposed Budgets and Fund Grants in Docket UG-240008, The Energy Project (TEP) hereby respectfully requests payment totaling \$54,261. In support of this request, TEP states the following:

On March 29, 2024, Cascade filed with the Commission tariffs to increase rates, triggering a General Rate Case.

On April 17, 2024, TEP filed a Request for Case Certification and Notice of Intent to Request a Fund Grant. At the prehearing conference, the Commission granted TEP's request for case certification.<sup>2</sup>

On June 14, 2024, TEP filed a Proposed Budget. On November 15, 2024, in Order 04 Approving Proposed Budgets and Fund Grants, the Commission approved TEP's Revised Proposed Budget in the amount of \$70,000.

TEP respectfully submits that this request for payment satisfies the requirement of the Funding Agreement Section 7.1 as follows:

---

<sup>1</sup> Docket U-210595, Order 02 Approving Agreement Subject to Condition; Requiring Refiling of Modified Agreement (February 9, 2023).

<sup>2</sup> Order 04 Approving Proposed Budgets and Fund Grants, ¶ 3 (November 15, 2024).

- a. Section 7.1(a). The itemized expenses, payees and hourly rates for amounts to be reimbursed, including billing details, and including separately identified amounts for consultant or expert fees and travel expenses are attached as Confidential Exhibit A. TEP does not include any fees for legal research databases, its preparation of required paper copies (printing, binders, mailing), secretarial staff time, or apportioned wages for in-house staff related to participation in this proceeding.
- b. Section 7.1(b). TEP was a full and active participant in this docket and the expenses are reasonable and directly attributable to issues and positions pursued on behalf of low-income customers and vulnerable populations. These issues included, among others, the impact of inflation and rate increases on low-income energy customers, credit and collection issues, performance-based regulation, language access, energy burden assessments, the impact of fixed charges on low-income customers, COVID-19 fees, and others issues impacting Cascade's revenue requirement. As the only party focusing solely on the interests of low-income customers in this proceeding, TEP provided comments, participated in settlement conferences, participated in prehearing/status conferences, and submitted testimony. The expenses included in Confidential Attachment A are Eligible Expenses as defined in Funding Agreement Section 7.3 and are reasonable and directly attributable to TEP's participation in this proceeding on behalf of low-income customers and vulnerable populations.
- c. Section 7.1(c). As set forth in this request for payment, TEP has provided information sufficient to demonstrate that TEP complied with all conditions and requirements of its Approved Fund Grant.
- d. Section 7.1(d). This request is a final request for payment under the Approved Fund Grant for the full amount of the Approved Fund Grant.
- e. Section 7.3. All of the expenses included in Confidential Attachment A are Eligible Expenses as defined in Section 7.3 of the Funding Agreement.

6 Upon approval of this request for payment by the Commission, please send payment to TEP as follows:

The Energy Project

Washington State Community Action Partnership

PO Box 7130, Olympia, WA 98507

7 TEP has satisfied the terms of the Funding Agreement and respectfully requests that the Commission approve payment of TEP's Fund Grant in the amount of \$54,261 from Cascade's Customer Representation Sub-Funds within 30 days of receiving this Request for Payment as provided in Section 7.6 of the Funding Agreement.

DATED: March 14, 2025

By: /s/ Yochanan Zakai

Yochanan Zakai, Washington Bar No. 61935\*

SHUTE, MIHALY & WEINBERGER LLP

396 Hayes Street

San Francisco, California 94102

(415) 552-7272

yzakai@smwlaw.com

*Attorneys for The Energy Project*

---

\* Mr. Zakai is not a member of the State Bar of California.