

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

WASHINGTON UTILITIES AND	)	DOCKET NO. UG 240008
TRANSPORTATION COMMISSION,	)	
	)	
Complainant,	)	ALLIANCE OF WESTERN ENERGY
	)	CONSUMERS' REQUEST FOR
v.	)	PAYMENT OF CASCADE NATURAL
	)	GAS CORPORATION CUSTOMER
CASCADE NATURAL GAS	)	REPRESENTATION SUB-FUND
CORPORATION	)	GRANT
	)	
Respondent.	)	
	)	

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**INTRODUCTION**

1. Pursuant to the Washington Extended Interim Participatory Funding Agreement (“IFA”), approved by the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) in Order 02 in Docket No. U-210595, Alliance of Western Energy Consumers (“AWEC”) hereby respectfully requests payment of a Fund Grant from the Cascade Natural Gas Corporation (“Cascade”) Customer Representation Sub-Fund in the amount of \$75,000. In support of this request, AWEC states the following:
2. On March 29, 2024, Cascade filed its request for a general rate revision for natural gas distribution service in Washington. In its filing, Cascade proposed a two-year rate plan beginning March 1, 2025, and March 1, 2026. In rate year 1, Cascade requested a \$43.8 million increase in Washington revenues, and in rate year 2, Cascade requested an additional \$11.7 million in revenues. On April 15, 2024, AWEC timely intervened and began its review of the case.

3. Cascade is designated as a “Participating Public Utility” in Article 1(g) of the IFA.  
Docket UG 240008 is an Eligible Proceedings for Fund Grants under Article 1(c) of the IFA.  
Accordingly, a Fund Grant may be made for this proceeding under the IFA.
4. On April 15, 2024, as required by Article 6.2 of the IFA, AWEC filed its Request for Case Certification and Notice of Intent to request a Fund Grant, which was also served on Cascade and all parties of record in the proceeding. In that filing, AWEC identified the Cascade Customer Representation Sub-Fund as the account from which AWEC intended to request a Fund Grant. On June 7, 2024, the Commission issued Order 03, confirming case certification status for AWEC.
5. On June 13, 2024, AWEC filed a Proposed Budget and requested a Fund Grant in this docket in the amount of \$75,000 to partially offset the costs of its participation in the proceeding. On November 15, 2024, the Commission issued Order 05, approving AWEC’s Proposed Budget for a Fund Grant in the amount of \$75,000. As shown on **Confidential Attachment A**, AWEC’s Proposed Budget for a Fund Grant partially offsets AWEC’s costs of participating in this proceeding.
6. AWEC focused on all aspects of Cascade’s requested increase to natural gas distribution rates. AWEC’s investigation included an analysis of the requested revenue requirement increase, return on equity, capital structure, cost of debt, jurisdictional allocations, rate base, special contract revenues, working capital, billing determinants, MDU cross charges, memberships and dues, director stock awards, proposed capital additions, tax issues, and depreciation and rate spread and rate design.
7. AWEC respectfully submits that this request for payment satisfies the requirement of IFA

Section 7.1 as follows:

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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 Attachment A**.

Section 7.3(b) - AWEC was a full and active participant in this docket and the expenses are reasonable and are directly attributable to issues and positions pursued on behalf of customers and consistent with AWEC's Proposed Budget. AWEC issued and reviewed discovery, filed testimony and reviewed the testimony of other parties, participated in settlement conferences with non-company parties, participated in settlement conferences with all parties, and drafted responses to the Commission's bench requests. The expenses included in Confidential Attachment A are Eligible Expenses as defined in IFA Section 7.3 and are reasonable and directly attributable to AWEC's participation in UG 240008 on behalf of all customers.

Section 7.1(c) – There were no conditions under this Fund Grant.

Section 7.1(d) – This request is a final request for payment under this Approved Fund Grant for the full amount of the Approved Fund Grant.

Section 7.3 – All of the expenses included in **Confidential Attachment A** are Eligible Expenses as defined in Section 7.3 of the IFA and are consistent with AWEC's Proposed budget in this proceeding.

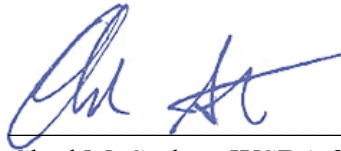
8. Upon approval of this request for payment by the Commission, please send payment to AWEC as follows:

Alliance of Western Energy Consumers  
3519 NE 15<sup>th</sup> Ave, #249  
Portland, OR 97212

9. AWEC has satisfied the terms of the IFA and respectfully requests that the Commission approve payment of AWEC's Fund Grant in the amount of \$75,000 from the Cascade Customer Representation Sub-Fund within 30 days of receiving this Request for Payment as provided in Section 7.6 of the IFA.

Dated in Portland, Oregon, this 24<sup>th</sup> day of March 2025.

Respectfully submitted,



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