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Jun 4, 2024

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Jeff Killip
Executive Director and Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

RE: UG- 231023, Cascade Natural Gas Corporation 2025 Integrated Resource Plan

Dear Director Killip:

Enclosed for filing is an Amendment to Cascade Natural Gas Corporation's Work Plan for its 2025 Integrated Resource Plan (IRP or Plan). Cascade has completed the eight Targeted TAG meetings where the Company discussed specific methodologies that are utilized in the IRP. Based on these meetings, Cascade received valuable feedback that the Company would like to explore prior to locking in values during the regular TAG meeting portion of the IRP process. Specifically, Cascade would like to explore building stock attrition rates, electrification, and equity. In order to do so, Cascade is requesting a three month extension on the 2025 IRP, moving the filing date from February 24, 2025 to May 23, 2025.

If there are any questions regarding this matter, please contact me at (509) 221-9808 or Mark Sellers-Vaughn at (509) 734-4589. Alternatively, we may be reached at brian.robertson@cngc.com, mark.sellers-vaughn@cngc.com, or at IRP@cngc.com.

Sincerely,
CASCADE NATURAL GAS CORPORATION

A handwritten signature in black ink that reads "Brian Robertson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Brian Robertson
Supervisor, Resource Planning

Enclosures

Purpose of the Integrated Resource Plan

The primary purpose of Cascade's long-term resource planning process has been, and continues to be, to inform and guide the Company's resource acquisition processes, consistent with the rule (WAC 480-90-238). Input and feedback from the Company's Technical Advisory Group (TAG) will continue to be an important resource to help ensure Cascade's IRP is developed from a broader perspective than Cascade could have on its own.

Outline of IRP Content:

The following is an outline of the Company's 2025 IRP plan. The organizational structure of the final IRP may be revised based on results of analysis and feedback received through the planning process.

- I. Executive Summary
- II. Company Overview
- III. Demand Forecast
- IV. Supply Side Resources
- V. Avoided Costs
- VI. Environmental Policy
- VII. Demand Side Management
- VIII. Distribution System Planning
- IX. Resource Integration
- X. Stakeholder Engagement
- XI. Two-year Action Plan
- XII. Glossary and Maps
- XIII. Appendices

2025 IRP Timeline

The 2025 IRP Timeline will include eight Public Targeted-TAG meetings and three regular Public TAG meetings. The following is Cascade's 2023 IRP timeline with green dates for those requested to be changed:

- Public Targeted-TAG process:
 - What is an IRP and how to get involved (Jan 2024)
 - Avoided Cost (Feb 2024)
 - Energy Efficiency (Mar 2024)
 - Equity in the IRP (Mar 2024)
 - Customer/Load Forecast (Apr 2024)
 - CCA/Compliance Modeling (Apr 2024)
 - Distribution System Planning (May 2024)
 - Resource Integration (May 2024)
- Public Process: Technical Advisory Group Meetings
 - TAG 1: Process, Key Points, IRP Team, Timeline, Regional Market Outlook, Planned Scenarios and Sensitivities, Stakeholder Engagement, Demand and Customer Forecast and Non-Core Outlook, Drilling down into segments of demand forecast. Upstream Pipeline presentation. (September 2024)
 - TAG 2: Respond to TAG 1 Feedback, Distribution System Planning, Alternative Resources, Price Forecast, Avoided Costs, Current Supply Resources, Transport Issues, Carbon Impacts, Energy Efficiency, Bio-Natural Gas, Preliminary Resource Integration Results. (October 2024)
 - File First Draft 2025 IRP: (December 2024)
 - TAG 3: Respond to TAG 2 feedback, Final Integration Results, finalization of plan components, Proposed new 2- to 4-year Action Plan. (February 2025)
 - File Second Draft 2025 IRP: (March 2025)
 - Comments due on draft (April 2025)

- TAG 4 (if needed) (May 2025)
- Final 2025 IRP Filed: on or before May 23, 2025
- Open Meeting Presentation to Commissioners: TBD

Planning Assumptions

Information needed to perform analysis will be gathered and input assumptions developed throughout the first eight months of 2024. This will include detailed definitions of alternative scenarios and all primary input assumptions for demand forecasting and resource modeling. Additional planning information will be assimilated into the analytical process and planning information that is not incorporated into the modeling process will continue to be assessed.

2025 IRP Improvements

In the 2023 IRP Staff Comments, the WUTC Commission noted several observations where they would like to see improvements in the 2025 IRP, specifically regarding the categories below:

- Renewable Natural Gas
- Demand Forecast
- Climate Commitment Act
- Conservation
- Price Forecasting
- Climate Change modeling
- Upstream and Distribution Emissions
- PLEXOS
- GTN Xpress
- Public Outreach and Engagement
- Other Comments

Cascade has developed an Equity Advisory Group (EAG). Cascade seeks to establish a clear understanding of the goals, outcomes, and objectives of the EAG. The process will begin with understanding the goals and objectives of the members in addition to building a working relationship. Initial areas of focus for the EAG will be in providing feedback in the development of Cascade's Multi-Year Rate Plan and Integrated Resource Plan. The IRP team will collaboratively work with the EAG to develop and maintain relationships. To gain interest in the IRP and increase participation, Cascade included social media post as well as provide information through bill inserts. Cascade is also considering holding meetings throughout Cascade's service territory during the first circulation of the Company's Draft IRP. Cascade will consider other means of increasing participation if bill inserts and traveling to the service territories are unsuccessful. The Company looks forward to working through the above listed improvements with Commission Staff throughout the 2025 IRP.

Process Item	Date	Process Element
TAG 1	Thursday, September 12, 2024	Process, Key Points, IRP Team, Timeline, Regional Market Outlook, Avoided Costs, Planned Scenarios and Sensitivities, Stakeholder Engagement, Demand and Customer Forecast and Non-Core Outlook, Drilling down into segments of demand forecast. Upstream Pipeline presentation.
Receive feedback on TAG 1	Friday, September 27, 2024	
TAG 2	Thursday, October 24, 2024	Respond to TAG 1 Feedback, Alternative Resources, Price Forecast, Current Supply Resources, Transport Issues, Carbon Impacts, Energy Efficiency, Bio-Natural Gas, Preliminary Resource Integration Results.
Receive feedback on TAG 2	Friday, November 8, 2024	
First Draft	Friday, December 6, 2024	
Comments Due	Friday, January 10, 2025	
TAG 3	Wednesday, February 5, 2025	Respond to TAG 2 feedback, Distribution System Planning, Final Integration Results, finalization of plan components, Proposed new 2- to 4-year Action Plan
Final Draft	Tuesday, March 4, 2025	
Comments Due	Tuesday, April 15, 2025	
TAG 4 (if needed)	Thursday, May 1, 2025	
Final Complete By	Friday, May 16, 2025	
File	Friday, May 23, 2025	