



February 20, 2025

Received
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Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: Comments of The Energy Project on Cascade Natural Gas's Low Income Weatherization Incentive Program, UG-250058

Dear Executive Director and Secretary Killip:

The Energy Project (TEP) has closely followed Cascade Natural Gas's (Cascade's) recent efforts and actions relating to its Low-Income Weatherization Incentive (Weatherization) Program. Cascade's Weatherization Program is currently administered and delivered by Community Action Agencies (CAAs or Agencies), community-based organizations with decades of experience providing no-cost energy efficiency services hard-to-reach populations. In a January 24, 2025 tariff filing, Cascade proposes to launch a pilot that would allow third party contractors to administer and deliver Weatherization measures to low-income customers. In response to concerns raised by TEP, Cascade filed a revision to the pilot program on February 19, 2025 containing two agreed-upon changes: an increase to required quality control inspections and the removal of the air sealing term. The Energy Project thanks Cascade for its collaboration and communication to date regarding the design of the pilot program, which represents a significant change to the delivery of Weatherization services.

In its cover letter, Cascade correctly characterizes TEP and Agencies' mixed opinions about the pilot proposal. TEP supports the pilot's purpose to expand the ability of Cascade's Weatherization Program to serve more low-income customers and applauds the collaborative approach the company has taken. However, there is also a risk that low-income customers receive differential and potentially substandard energy efficiency services and missed connections to wrap-around community resources. With the revisions Cascade made in response to TEP's concerns, particularly the increase in required quality control inspections, TEP can express cautious optimism in exploring the pilot model. In addition to the increase in required quality control inspections, TEP supports Cascade's commitment to providing Agencies the first right of refusal for any new customer leads and that the 'whole home' approach to weatherization is a goal of the pilot additions.

Cascade has a track record of collaboration with a strong group of Community Action Agencies committed to energy efficiency with deep presences in their communities. TEP has



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confidence that Cascade, Agencies, the Department of Commerce, Commission Staff, and other interested parties can continue to work together productively to troubleshoot and refine the pilot. Continuing to leverage the experience of this group to better serve our community is important because providing weatherization services to vulnerable and low-income households is a complex undertaking.

Respectfully submitted,

/s/ Shaylee Stokes

Director of The Energy Project

Washington State Community Action Partnership

PO Box 7130, Olympia, WA 98507

shaylee@wapartnership.org