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April 2, 2021

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

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COMMISSION

Re: Docket No. UG-210194, Puget Sound Energy's Voluntary Renewable Natural Gas Tariff Filing

Dear Mr. Johnson,

Cascade Natural Gas Corporation ("Cascade or Company") hereby submits the following comments in support of Puget Sound Energy's Voluntary Renewable Natural Gas Tariff filing in Docket No. UG-210194.

Cascade supports PSE's position that initial start-up costs to implement a statutorily-required voluntary renewable natural gas program, created to benefit all customers and the public, should be borne by all customers who have the opportunity to participate in such program. Specifically, Infrastructure Technology (IT) expenses that allow all eligible natural gas customers to participate in a voluntary RNG program should be borne by all customers.

It is Cascade's understanding, based on conversations with various Commission staff members, that Staff intends to follow specific language in the Commission's policy statement issued December 16, 2020, in Docket No UG-190818, specifically requiring all costs be included in the program.

Cascade believes that including such start-up costs as a direct cost of the voluntary program would have the unintended consequence of pricing the program such that there would be no participants. Cascade believes these costs are mandated by law and as such are non-discretionary regardless of participation and therefore appropriate to be recovered by all rate payers. These costs are not dissimilar to many other required programs such as energy efficiency where all customers benefit from those customers that do take part in the program so following a similar recovery from all customers is appropriate.

Cascade also supports PSE's decision to utilize the Midwest Renewable Energy Tracking System (M-RETS) to track Renewable Thermal Certificates (RTC) and to verify environmental attributes and intends to use M-RETS for future proposed RNG programs.

Questions regarding this filing should be directed to me at (509) 734-4593.

Sincerely,

/s/ Michael Parvinen

Michael Parvinen
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