

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

CASCADE NATURAL GAS CORPORATION

Petition for Temporary Exemption from WAC  
480-90-238(4), Integrated Resource Plan

PETITION OF CASCADE NATURAL  
GAS CORPORATION

**I. INTRODUCTION**

1 Pursuant to WAC 480-90-238(4), Cascade Natural Gas Corporation (“Cascade” or the  
2 “Company”) files this petition (“Petition”) with the Washington Utilities and Transportation  
3 Commission (the “Commission”) respectfully requesting that the Commission allow Cascade to  
4 change the filing date of the current Integrated Resource Plan (“IRP”) from February 24, 2025, to  
5 May 23, 2025. Cascade is required to submit an IRP within two years of the date of its previous  
6 filing (February 24, 2023, in this case). However, WAC 480-90-008 provides that the Commission  
7 may grant an exemption from any rule in WAC 480-90, including WAC 480-90-238(4), if the  
8 exemption is consistent with the public interest, the purposes underlying the regulation, and  
9 applicable statutes. This petition describes why a temporary exemption from WAC 480-90-  
10 238(4) is in the public interest and why it is consistent with the underlying purpose of the  
11 Commission’s IRP rules.<sup>1</sup>

**II. BACKGROUND**

14 Cascade is a natural gas utility and public service company doing business in the state of

---

<sup>1</sup> No statute requires a natural gas utility to file an IRP; rather it was established by rule. *See In the Matter of Commission Staff’s Petition for an Order Granting Exemption from the Requirements of WAC 480-100-238(4)-(5) and WAC 480-90-238(4)-(5)*, Docket Nos. UE-180607 & UG-180608, Order 02, at P. 9 (2019).

1 Washington and is subject to the jurisdiction of the Commission regarding rates, service, and  
2 accounting practices. The Company’s principal place of business is 8113 W. Grandridge Blvd.,  
3 Kennewick, Washington 99336.

4 **III. COMMUNICATIONS**

5 Communications regarding this Petition should be addressed to:

6 Cascade Natural Gas  
7 Integrated Resource Planning  
8 8113 W. Grandridge Blvd.  
9 Kennewick, WA 99336  
10 Telephone: (509) 221-9808  
11 Email: irp@cngc.com

12 **IV. REASONS FOR REQUEST FOR IRP EXTENSION**

13 Cascade held eight Targeted Technical Advisory Group (“TAG”) meetings from February  
14 2024 through May 2024. During these Targeted TAG meetings, Cascade met with interested  
15 parties to discuss IRP methodologies. Cascade received valuable feedback that the  
16 Company would like to explore prior to locking in values during the regular TAG meeting  
17 portion of the IRP process. Absent an extension, Cascade would not be able to incorporate  
18 several of the suggestions from the Targeted TAG meetings.

19 Requesting an extension for the proposed project is crucial, as it allows for a comprehensive  
20 analysis of building stock attrition rates, electrification, and equity. Evaluating building stock  
21 attrition rates provides insights into the lifespan and replacement needs of existing  
22 infrastructure, ensuring sustainable development under the current Washington State  
23 Building Code rules. A detailed study on electrification will help identify the potential  
24 challenges and opportunities of transitioning gas to electric systems. This analysis can  
25 highlight the benefits of maintaining a balanced energy mix that includes natural gas, which  
26 offers reliability and cost-effectiveness. Additionally, addressing equity ensures that all

1 communities, particularly underserved and marginalized ones, benefit from these  
2 advancements, fostering inclusive growth and social justice. This thorough examination  
3 serves the public's best interest by promoting long-term sustainability, environmental  
4 stewardship, and equitable access to modernized infrastructure.

5 **V. Temporary Exemption is Consistent with the Underlying Purpose of the IRP Rules**

6 Cascade's request to extend the filing date of its IRP to May 23, 2025, aligns with the  
7 fundamental objective of the IRP rules under WAC 480-90-238 Integrated Resource  
8 Planning. The purpose of these rules is to ensure that each natural gas utility, such as  
9 Cascade, effectively meets system demand through a cost-effective combination of  
10 natural gas supply and conservation efforts. Cascade contends that conducting a  
11 comprehensive analysis and incorporating all pertinent information currently under  
12 development will significantly enhance the accuracy and transparency of its IRP planning  
13 process. Therefore, this request is in accordance with the Commission's IRP rules.

14 **VI. IRP Workplan Filing and Technical Advisory Groups**

15 Cascade has filed its IRP workplan under docket UG-231023, which outlines its approach  
16 to meeting system demand with the most cost-effective mix of natural gas supply and  
17 conservation efforts, in accordance with WAC 480-90-238, Integrated Resource  
18 Planning. Cascade believes that extending the filing date of its IRP to May 23, 2025,  
19 aligns with the intention of the Commission's IRP rules. This extension allows Cascade to  
20 conduct a thorough analysis and integrate all relevant information currently in  
21 development, ensuring the accuracy and transparency of its IRP planning process. Thus,  
22 this request is consistent with the purpose of the IRP rules set forth by the Commission.

23 **VII. Conclusion**

24 Cascade respectfully requests that the Commission issue an order granting a

1 temporary exemption from WAC 480-90-238(4), permitting the Company to submit  
2 its IRP by May 23, 2025. Based on the rationale outlined earlier, this exemption  
3 serves the public interest and aligns with the fundamental objectives of the  
4 Commission's IRP rules.

5 Dated this 25<sup>th</sup> day of June 2024.

6 Respectfully Submitted,  
7

8  
9 */s/ Brian L Robertson*

10  
11 Brian L Robertson  
12 Manager, Supply Resource Planning  
13 Cascade Natural Gas  
14 8113 W. Grandridge Blvd.  
15 Kennewick, WA 99336  
16 Phone: (509) 221-9808  
17 Email: brian.robertson@cngc.com