

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Application of

CASCADE NATURAL GAS  
CORPORATION

Petition for an Accounting Order  
Associated with COVID-19 Public Health  
Emergency

DOCKET UG-200479

PETITION TO INTERVENE  
OF THE ENERGY PROJECT

1 Pursuant to WAC 480-07-355 (1), The Energy Project hereby petitions the Washington Utilities and Transportation Commission (Commission or UTC) for leave to intervene in the above-captioned docket as an intervenor. The Energy Project requests intervention with full party status as described in WAC 480-07-340.

2 The business address of The Energy Project is:

Shawn Collins  
The Energy Project  
3406 Redwood Avenue  
Bellingham, WA 98225  
Phone: (360) 389-2410  
Email: shawnc@oppco.org

3 The Energy Project will be represented in this proceeding by Simon J. ffitich. All documents relating to this proceeding should be served as follows: (1) to Shawn Collins and The Energy Project in electronic format only at the above email address; (2) to Simon J. ffitich in electronic format only at:

Simon J. ffitich  
Attorney at Law  
321 High School Rd. NE, Suite D3, Box No. 383  
Bainbridge Island, WA 98110  
Phone: (206) 669-8197  
E-mail: [simon@ffitichlaw.com](mailto:simon@ffitichlaw.com)

4           The Energy Project works with Community Action Partnership agencies that provide rate assistance and energy efficiency programs for Cascade’s low-income natural gas customers. The Energy Project also works generally with utilities and other stakeholders to develop and expand rate assistance and energy efficiency programs for low-income customers in Washington. The Energy Project is a frequent party in general rate cases and other significant dockets before the UTC involving Washington investor-owned utilities when energy affordability, energy efficiency, and customer service policies are at issue. The Energy Project has an interest in the rate issues raised in Cascade’s filing and the potential impact on low-income customers.

5           The Energy Project has a direct and substantial interest in Cascade’s filing in this docket and no other party will adequately represent those interests. The Energy Project will be the only party to focus solely on the interests of low-income customers in this proceeding. The Energy Project’s intervention will not unreasonably broaden the issues, burden the record, or delay the proceeding. Accordingly, it is in the public interest to allow The Energy Project to intervene in this docket.

6           For the foregoing reasons, The Energy Project respectfully petitions the Commission for leave to intervene in this proceeding.

7           Dated this 28<sup>th</sup> day of August, 2020.

Simon J. ffitc  
*/s/ Simon. J. ffitc*, WSBA No. 25977  
Attorney at Law  
For The Energy Project