

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS  
CORPORATION,

Respondent.

DOCKET UG-210755

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  
(360) 389-2410  
shawnc@oppco.org

3 The Energy Project will be represented in this proceeding by attorney Yochanan Zakai. 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 Yochanan Zakai in electronic format only at:

Yochanan Zakai  
SHUTE, MIHALY & WEINBERGER LLP  
396 Hayes Street  
San Francisco, California 94102  
(415) 552-7272  
yzakai@smwlaw.com

4 Further, The Energy Project requests that a courtesy copy of service and correspondence relating to this matter be sent via e-mail to:

Sara L. Breckenridge  
Legal Secretary  
(415) 552-7272  
breckenridge@smwlaw.com

5 The Energy Project works with Community Action Partnership agencies that provide rate assistance and energy efficiency programs for Cascade Natural Gas Corporation's (Cascade's) low-income electric 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 Pacific Power's filing and the potential impact on low-income customers and programs.

6 The Energy Project has a direct and substantial interest in Cascade's tariff 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.

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

DATED: October 19, 2021

By: /s/ Yochanan Zakai

Yochanan Zakai, Oregon State Bar No. 130369\*

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*Attorneys for The Energy Project*

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\* Mr. Zakai is not a member of the State Bar of California.