



U-210590

8113 W. GRANDRIDGE BLVD., KENNEWICK, WASHINGTON 99336-7166
TELEPHONE 509-734-4500 FACSIMILE 509-737-7166
www.cngc.com

September 26, 2022

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Docket U-210590 - Commission’s proceeding to develop a policy statement addressing alternatives to traditional cost of service rate making.

Dear Ms. Maxwell:

Cascade Natural Gas Corporation (“Cascade” or “Company”) hereby submits the following written comments to the Washington Utilities and Transportation Commission (“Commission”) in regard to Phase 1 of Docket U-210590 and in response to the August 5, 2022, Notice of Opportunity (“Notice”) that seeks public comments related to developing and articulating regulatory goals, desired outcomes, and design principles. Specifically, the Commission is seeking comments to the proposed utility performance metrics, reporting, and review processes.

In general, the final metrics should reflect SMART design principles that successfully reflect *specific, measurable, achievable, realistic, and timely* metric goals, while purging any current Commission reporting and processes that overlap with the final performance-based regulatory metrics. The Commission already receives a variety of data points and information through multiple reports and filings each year; as a result, streamlining processes and reporting could increase the productivity of the Commission’s review, delivery of relevant utility reports and outcomes, and increase the ease of information for the public.

Cascade notes there were many metrics proposed by other stakeholders that were either vague or required information that most utilities currently do not collect. For example, a few metrics asked for ‘adoption’, ‘decision’, or ‘avoidance’ with little additional information provided. Metrics such as these would need to provide clear guideline of what is being reviewed. Other instances asked for demographics, income, gender identity, and other types of personal data in order to perform such metrics. Cascade, and likely many other utilities, do not collect such personally identifying or income information. If such information were to be collected, it would be voluntary which would leave the data incomplete and would likely not provide an accurate representation of all the data. In addition, it would take many years to amass such information to have a reasonable dataset to gauge against and provide a baseline to measure against. Also, any

target metrics established should be reflective of the communities in which each individual utility operates.

Cascade agrees with other utilities' written comments submitted in this docket, such as, but not limited to, Avista Corporation and Puget Sound Energy's comments dated September 26, 2022. If you have any questions, please contact me at (208) 377-6015 or Christopher Mickelson at (509) 734-4549 .

Sincerely,

/s/ Lori Blattner

Lori A. Blattner
Director, Regulatory Affairs
8113 W. Grandridge Blvd.
Kennewick, WA 99336
lori.blattner@intgas.com