



ATTORNEY GENERAL OF WASHINGTON

Public Counsel

800 Fifth Ave • Suite 2000 • MS TB-14 • Seattle WA 98104-3188 • (206) 464-7744

March 19, 2021

SENT VIA WUTC WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Received
Records Management
03/19/21 15:15
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Cascade Natural Gas Corporation Proposed Revision to Tariff WN U-3 Adding Schedule 304, Temporary COVID-19 Residential Bill Assistance Program (Big HEART Grant).
Docket UG-210145

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in advance of the March 25, 2021, Open Meeting. These comments are in response to Cascade Natural Gas Corporation's ("Cascade") filing to offer additional emergency assistance to customers impacted by the ongoing economic and public health crises. Public Counsel appreciates Cascade's engagement with the Washington Energy Assistance Fund (WEAF) Advisory Group and efforts to incorporate feedback into this filing.

Cascade's filing in this docket is the result of the Commission's Order 01 in Docket U-200281, which ordered the investor-owned utilities to increase residential assistance fund budgets and expand program offerings to assist with current and past due bills. These programs were to be made available to households with an annual income up to 200 percent of the federal poverty level (FPL), in line with current WEAF grant offerings. This filing redoubles utility efforts to address the overwhelming need facing Washingtonians in this crisis. Previously, the Company offered Hardship Economic Assistance Receivable Temporary (HEART) grants in the immediate wake of the pandemic. The proposed program in this filing expands the assistance available to customers in need through the creation of Big HEART grants. The tariff revision includes arrearage assistance and streamlined qualification processes to get assistance to provide assistance efficiently.

Public Counsel's Recommendation

Public Counsel recommends the Commission approve the tariff revisions, allowing the Company to administer Big HEART grant funds to financially struggling residential customers, effective April 1, 2021.

To: Mark L. Johnson, Executive Secretary
Re: Cascade Natural Gas Corporation Proposed Revision to Tariff WN U-3 Adding Schedule 304, Temporary COVID-19 Residential Bill Assistance Program (Big HEART Grant).
Docket UG-210145
Date: March 19, 2021
Page 2 of 3

The proposed Big HEART grants are set to provide significant relief for crisis-affected residential customers. Per the Commission's Order in U-200281, these grants are available to customers with annual household incomes up to 200 percent of the federal poverty levels and can be applied to past due balances on customer accounts. Customers would be eligible to receive up to \$2,500 worth of Big HEART assistance in the program year. The Big HEART grants are funding through an increase of available assistance funds, up to one percent of Washington retail revenues, or approximately \$2.47 million. In order to prioritize customers with the most significant need, the Company proposes multiple pathways to qualification for the Big HEART grants and they are each described below. Receiving a Big HEART grant does not preclude customers from receiving additional assistance from programs administered by community action agencies.

A. Automatic Hardship Grant

Customers with a past-due balance who have received any form of bill assistance in the previous 24 months will automatically receive a grant matching the outstanding balance, up to \$2,500. This will not result in a credit to the account, but will relieve arrearages up to the maximum benefit amount. To prioritize the customers most in need, the grants will be applied to accounts with the longest-standing arrearages first and shorter-term arrearages from that point forward.

B. Financial Hardship Grant

Customers who have not received assistance in the previous 24 months, but are experiencing financial hardship may still be eligible for Big HEART grants. If a customer expresses hardship verbally or in writing, the Company will work to assess income qualifications, which is confirmed through verbal confirmation of household income. Customers who meet the income criteria will be provided with up to \$2,500 to clear arrearages on their accounts.

C. Benefits through Community Action Agencies

Customers experiencing hardship can still schedule appointments with their local community action agencies. Upon expressing hardship, the community action agencies will assess qualification for other programs, including WEAFF and LIHEAP, before making a referral to the Big HEART program. Receiving WEAFF or LIHEAP benefits does not preclude a customer from receiving a Big HEART grant.

Additionally, Public Counsel encourages Cascade to provide the data required under Order 01 in Docket U-200281, in addition to updated data on the progress of this program, in advance of the May Open Meeting at which the Commission will evaluate the disconnection moratorium. Providing the data ahead of the May Open Meeting will allow the Commission and stakeholders to review and analyze the data to understand how debt assistance programs have made a significant impact on customers.

To: Mark L. Johnson, Executive Secretary
Re: Cascade Natural Gas Corporation Proposed Revision to Tariff WN U-3 Adding Schedule 304, Temporary
COVID-19 Residential Bill Assistance Program (Big HEART Grant).
Docket UG-210145
Date: March 19, 2021
Page 3 of 3

Again, we appreciate the opportunity to submit these comments. If you have any questions about this filing, please contact Corey Dahl at (206) 464-6380 or via e-mail at Corey.Dahl@ATG.WA.GOV.

Sincerely,

/s/ *Lisa W. Gafken*

LISA W. GAFKEN, WSBA No. 31549
Assistant Attorney General
Public Counsel Unit Chief
Lisa.Gafken@ATG.WA.GOV
(206) 464-6595