



8113 W. GRANDRIDGE BLVD., KENNEWICK, WASHINGTON 99336-7166
TELEPHONE 509-734-4500 FACSIMILE 509-737-9803
www.cngc.com

July 20, 2023

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

Re: Do Not Re-docket, UG-230551, CNGC Advice No. W23-06-02, Supplemental Filing
Cascade Arrearage Relief Energy Savings (CARES) Program

Dear Amanda Maxwell,

On June 30, 2023, Cascade Natural Gas Corporation (Cascade or Company) filed Advice No. W23-06-02, which was docketed as UG-230551. On July 17, the Company filed substitute sheets. The Company now supplements its filing a second time by submitting the following substitute sheets:

Original Sheet No. 20-A
Seventh Revision of Sheet 303-A

The Company requests that the effective date remain August 1, 2023, for the following sheets submitted in Docket No. UG-230551:

Thirty-Ninth Revision of Sheet No. 2
Twenty-Sixth Revision of Sheet No. 2-A
Original Sheet No. 20
Original Sheet No. 20-A (substitute sheet filed herein, on July 20, 2023)
Original Sheet No. 20-B
Original Sheet No. 20-C (substitute sheet filed July 17, 2023)
Original Sheet No. 20-D
Original Sheet No. 302

The Company requests to extend the effective date until September 4, 2023, for the following sheet submitted in Docket No. UG-230551:

Original Sheet No. 592

The Company also has attached a Less than Statutory (LSN) form seeking a waiver from RCW 80.28.60, WAC-480-80-121, and WAC 480-90-194 to allow the following sheets to become effective July 28, 2023:

Sixth Revision of Sheet 303
Seventh Revision of Sheet 303-A (substitute sheet filed herein, on July 20, 2023)
Third Revision of Sheet 303-B

Each revision and request contained herein is explained in detail below.

Substitute Tariff Sheets

Sheet 20-A. The Company revises Sheet 20-A in its proposed Schedule 20, Cascade Arrearage Relief Energy Savings (CARES) Program, to include language requested by Commission Staff that states that a customer may request that a hardcopy CARES Program application be mailed to their residence.

Sheet 303-A. Sheet 303-A in Schedule 303, Washington Energy Assistance Fund (WEAF) Program is revised to modify the stated program year budget cap of \$1,531,200 to \$1,800,000. The WEAF Program is forecast to spend its budget by the end of July, two months before the end of the program year. Historically, the Company has spent only half of its maximum allotted budget by this time in the program year. This unprecedented spending has occurred due to the implementation of increased minimum and maximum grant amounts. Also, efforts to increase outreach have proven successful as the WEAF Program has served more customers this year than in any prior year.

On July 19, 2023, Cascade Natural Gas discussed the pending depletion of the WEAF budget with its Advisory Group. The Energy Project proposed that the Company request an increase in the program budget to ensure customers would continue to have access to the bill assistance program up to the implementation of the CARES program on October 1, 2023. The Advisory Group agreed with this proposal as it does not want to prematurely stop the program after much effort has been made to increase access and awareness of WEAF grants. The Advisory Group consists of the Energy Project, Public Council, Northwest Energy Coalition, Commission Staff, Cascade, and Cascade's community action agencies.

CARES Cost Recovery Effective Date of September 4, 2023

The Company is requesting a change to its effective date for Schedule 592, Cascade Arrearage Relief Energy Savings (CARES) Program Cost Recovery. Schedule 592 imposes a new charge on customers, and in compliance with WAC 480-90-194, the Company began noticing customers of this billing change with emails and bill inserts with bills issued in the July bill cycle. Commission Staff raised the concerns that customers billed at the end of the billing month would not receive a full thirty days' notice of the new rate that would apply on October 1, 2023. To address Commission Staff concerns, the Company has agreed to extend the effective date of the tariff sheet containing the new rate, while retaining the initially requested effective date of August 1, 2023, for Rule 20 and Schedule 302, which both define the CARES Program. Retaining the August 1, 2023, effective date for the tariff sheets allows Cascade the necessary sixty days to prepare back-office procedures and billing system adjustments for the CARES Program implementation.

WEAF Program Effective Date of July 28, 2023, and Waivers of RCW 80.28.050, WAC-480-80-121, and WAC 480-90-194

As mentioned above, the Company is revising Sheet 303-A to increase its maximum budget to prevent disallowance of pledges prior to the end of the WEAF program year. Since this need for funding is immediate, the Company is submitting an LSN form requesting the Commission grant the Company a waiver of RCW 80.28.050, WAC-480-80-121, and WAC 480-90-194 so that the Company's tariff sheets

defining the WEAFF Program may become effective July 28, 2023, since our original filing was on June 30, 2023; thus less than the statutory 30-day requirement.

Sheets 303, 303-A, and 303-B were revised in the initial filing under this docket so that each sheet states that the program will no longer be offered after September 30, 2023, as the CARES Program will be implemented on October 1, 2023, offering the same eligible customers arrearage relief and ongoing energy discounts. The Company requests the WEAFF tariff sheets to all become effective on July 28, 2023.

As previously mentioned, the Company began notifying customers of Advice No. W23-06-02 as part of its July bill cycle. With the need for additional WEAFF funding prior to the end of July, the change to the effective date does not allow all customers to be notified thirty days prior to the effective date. The Company and Staff discussed this and determined the Company would ask for a waiver from WAC 480-90-194 to allow the WEAFF modifications since Commission Staff believes that the transition from the WEAFF Program to the CARES Program is a restriction of service that triggers a customer notification per WAC 480-90-194. The Company disagrees with this strict reading of the rule since the WEAFF offering is not going away but is being rebranded and enhanced as part of the CARES Program. The same eligible customers who could access WEAFF will be able to access CARES. However, despite this disagreement in interpretation, the Company requests a waiver from WAC 480-90-194, which Staff believes requires the Company to notify customers thirty days prior to the restricted access to a service.

Conclusion

Docket UG-230551 represents many hours of hard work, discussion, and compromise among numerous parties participating in the Company's Advisory Group. This supplementary filing contains a number of unusual changes, but the Company is grateful with Staff for their willingness to work with the Company on determining a path forward that would allow the Company the time it needs to implement CARES, continue offering WEAFF through the end of the program year, and maintain compliance with the rules.

This filing contains the following files:

UG-230551-W23-06-02-CARES-Program-CLtr-07-20-23.pdf
UG-230551-W23-06-02-CARES-Program-Trf- 07-20-23.pdf
UG-230551-W23-06-02-CARES-Program-Leg-Trf-07-20-23.pdf
UG-230551- W23-06-02-CARES-Program-LSN-07-20-23.pdf

For any inquiries regarding this filing, please direct your questions to Chris Mickelson at (509) 734-4549.

Sincerely,

/s/ Lori A. Blattner

Lori A. Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W Grandridge Blvd
Kennewick, WA 99336-7166

Enclosures