



NW Energy Coalition

December 17, 2021

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

UG-210838

Received
Records Management
12/17/21 15:56:56
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: NW Energy Coalition's comments on Cascade Natural Gas's 2022-2023 Biennial Conservation Plan, Docket UG-210838

Dear Ms. Maxwell:

The NW Energy Coalition ("NWECC") appreciates the opportunity to offer comments on the proposed biennial conservation plan (BCP) from Cascade Natural Gas for 2022-2023. NWECC is an alliance of more than 100 organizations united around energy efficiency, renewable energy, fish and wildlife preservation and restoration in the Columbia basin, low-income and consumer protections, and informed public involvement, all towards the mission of building a clean and affordable energy future. NWECC has been an active participant in CNG's Conservation Advisory Group throughout the development of this BCP.

We appreciate the Company's thorough filing and the meetings held throughout the year to incorporate advice and share information. Overall, we have no significant comments regarding the BCP itself. There are, however, a number of external pressures that may require the Company to adaptively manage its portfolio during the implementation period, including federal appliance standards, state building energy codes, implementation of the Climate Commitment Act, and further state legislation and policy direction to reduce greenhouse gas emissions. With those pressures in mind, we encourage the Company to explore ways to increase envelope measure offerings for customers, as we think that these measures will provide benefits to customers and less risk overall to both the Company and the customers.

We understand the proposed conditions for approval are still under review and discussion by Staff and stakeholders. We appreciate Staff's work to finalize these conditions and look forward to any further discussion on these conditions at the open meeting in January.

Thank you for the opportunity to provide comments.

Respectfully,

/s/
Amy Wheelless
Senior Policy Associate
NW Energy Coalition