

3TIER Environmental Forecast Group
Advocates for the West
Alaska Housing Finance Corporation
Alliance to Save Energy
Alternative Energy Resources Organization
American Rivers
The Apollo Alliance
Audubon Washington
Bonneville Environmental Foundation
Central Area Motivation Program
Citizens Utility Board of Oregon
City of Ashland
Clackamas County Weatherization
Climate Solutions
The Climate Trust
Community Action Partnership of Oregon
Community Action Partnership Assoc. of Idaho
Conservation Services Group
David Suzuki Foundation
Earth and Spirit Council
Earth Ministry
Ecos Consulting
Ecological Design Center
eFormative Options, LLC
Emerald People's Utility District
The Energy Project
Energy Trust of Oregon, Inc.
enXco Development Corporation
Environment Oregon
Environment Washington
Eugene Water & Electric Board
Friends of the Earth
Golden Eagle Audubon Society
Grasslands Renewable Energy
Horizon Wind Energy
Home Performance Washington
Housing and Comm. Services Agency of Lane Co.
Human Resources Council, District XI
Iberdrola Renewables
Idaho Conservation League
Idaho Rivers United
Idaho Rural Council
Idaho Wildlife Federation
Interfaith Network for Earth Concerns
Kootenai Environmental Alliance
Laborers International Union of North America, NW Region
League of Women Voters – ID, OR & WA
Metrocenter YMCA
Missoula Urban Demonstration Project
Montana Audubon
Montana Environmental Information Center
Montana Public Interest Research Group
Montana Renewable Energy Association
Montana River Action
Montana Trout Unlimited
Moontown Foundation
The Mountaineers
Multnomah County Weatherization
National Center for Appropriate Technology
Natural Resources Defense Council
New Buildings Institute
Northern Plains Resource Council
Northwest Energy Efficiency Council
Northwest Renewable Energy Institute
Northwest Solar Center
NW Natural
NW SEED
Olympic Community Action Programs
Opportunities Industrialization Center of WA
Opportunity Council
Oregon Action
Oregon Energy Coordinators Association
Oregon Environmental Council
Oregon HEAT
Pacific Energy Innovation Association
Pacific NW Regional Council of Carpenters
Pacific Rivers Council
The Policy Institute
Portland Energy Conservation Inc.
Portland General Electric
Puget Sound Alliance for Retired Americans
Puget Sound Energy
Renewable Northwest Project
River Network
Salmon for All
Save Our Wild Salmon
Seattle Audubon Society
Seattle City Light
Sierra Club
Sierra Club, BC and MT Chapters
Snake River Alliance
Solar Oregon
Solar Washington
South Central Community Action Partnership, Inc
Southeast Idaho Community Action Agency
Southern Alliance for Clean Energy
Spokane Neighborhood Action Programs



February 11, 2011

Washington Utilities and Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-7250

Re: Cascade Natural Gas Company
2010 Natural Gas Integrated Resource Plan, Docket UG-091967

Dear Executive Director and Secretary:

The Coalition appreciates the opportunity to comment on the Cascade Natural Gas Integrated Resource Plan (IRP). We have participated in the Cascade IRP advisory group process and acknowledge that Cascade is developing its resource planning capabilities.

While the Coalition recognizes that Cascade is not currently subject to decoupling or conservation requirements similar to those of their electric utility counterparts, if similar mechanisms were in effect we would not interpret a goal to secure 75% of achievable conservation savings to be sufficient.

Furthermore, the Coalition would like to express concerns with the industry-wide trend for natural gas utilities to ramp up and down conservation programs as gas prices fluctuate. We are not as confident that natural gas prices will remain as low as they are projected to be over the long term due to the environmental ramifications of shale gas extraction. Stable program offerings are critical to building customer awareness, participation and confidence and maintaining a strong base of trade allies and enthusiastic retailers.

Instead of monitoring legislative building code changes as outlined in Cascade's 2-year action plan, the Coalition would like to encourage Cascade to be an active participant in the code making process. As the lowest cost energy savings available, utilities have an interest in ensuring code savings occur.

If the Commission has any questions regarding our comments, please feel free to contact me.

Sincerely,

Lynne Dial
Policy Associate

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