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February 3, 2023

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

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 2A of Docket U-210590 and in response to the January 5, 2023, Notice of Opportunity ("Notice") that seeks general feedback and suggestions for further phases of this proceeding. The following are Cascade's responses to the specific questions posed in the Notice:

1. *Do you have any thoughts, concerns, or suggestions on the proposed scope or timing of Phase 2A?*

Cascade believes the work plan for Phase 2A seems reasonable.

2. *What are the most important issues for the Commission to address in Phase 2A?*

Cascade perceives the following as the most important issues for the Commission to address: 1) clear calculation definitions; 2) data availability and timing; 3) reporting frequency; and 4) expectations of the review and approval process. Answers to these matters will hopefully reduce misperception and any overly burdensome procedures.

3. *Do you have any other comments you would like to offer on the overall work plan (filed on January 27, 2022), including phases beyond Phase 2A, or on the development of policy under RCW 80.28.425 more generally?*

Cascade does not have any additional comments on the overall work plan at this time.

If you have any questions, please contact me at (208) 377-6015.

Sincerely,

/s/ Lori Blattner

Lori A. Blattner
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