BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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DOCKET NO. UG-152286

THE ENERGY PROJECT'S PETITION TO INTERVENE

COMES NOW, Petitioner The Energy Project, by and through its undersigned legal

counsel, and pursuant to WAC 480-07-355, respectfully petitions for the right to intervene as a party to the above-captioned proceeding, with all rights and responsibilities appurtenant thereto as described in WAC 480-07-340.

Pursuant to WAC 480-07-355, Petitioner offers the following information:

(i) The Petitioner's name and address is

The Energy Project Opportunity Council 3406 Redwood Ave. Bellingham, WA, 98225

The Energy Project will be represented in this matter by Brad M. Purdy. All documents pertaining to this proceeding should be sent to:

Brad M. Purdy Attorney at Law 2019 N. 17th St. Boise, ID 83702 208-384-1299 (Land) 208-484-9980 (Cell) bmpurdy@hotmail.com

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(ii) The administrative rules at issue are WAC Sections 480-07-340 through 355.

Petition to Intervene of the Energy Project

(iii) The Energy Project is a division of the Opportunity Council ("OC"), a non-profit community action agency, and advocates statewide on behalf of all community action agencies for programs that help to provide affordable access to essential home energy services for lowincome households. Among others, The Energy Project represents the interests of OC, which is located at 1111 Cornwall Avenue, Bellingham, WA 98225. The Energy Project also works in collaboration with the Washington State Community Action Partnership ("WSCAP") and the Washington Department of Commerce. WASCAP serves and coordinates with all of the Community Action Agencies in the State of Washington. Finally, in addition to the agencies/entities already identified, the following agencies provide varying forms of service to low income customers within the Cascade Natural Gas Company service territory: Community Action of Skagit; CAC of Lewis, Mason and Thurston Counties; Kitsap Community Resources; Northwest Community Action Center; Blue Mountain Action Council; Community Action Connections; Coastal Community Action Program; Chelan-Douglas CAC; Lower Columbia CAP; Yakima Valley OIC, and; Snohomish County Human Services.

The Energy Project has previously intervened in numerous other proceedings on a regular basis before this Commission, including Cascade Natural Gas rate cases. For the reasons listed herein, the intervention of The Energy Project in this proceeding is in the public interest. The Energy Project requests that the Commission grant its petition to intervene in this matter.

(iv) Though Petitioner has not yet had ample opportunity to fully assess all matters in controversy and formulate a precise position on such matters, Petitioner generally takes the position that the proposed revenue requirement increase will have a profound impact on all of Cascade Natural Gas Company's residential customers, including those who are considered "low-income." Also of importance and potential concern is the manner in which Cascade has proposed to expedite the ratemaking process. This important transition is in a critical state of formulation and input from all stakeholders, including the Energy Project, is essential as

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decisions made in this and similar other cases might well revise the long-standing process of utility ratemaking.

There appear to be numerous other issues relevant to residential, low-income customers including, but not limited to, Cascade's low-income customer bill assistance program the Washington Energy Assistance Fund ("WEAF,"), and associated fees and charges.

The overall impact of the Company's filing will be to increase the number of households unable to afford electricity service, reduce the relative number of households that agencies providing assistance (including, *inter alia*, weatherization measures) to Cascade customers will be able to assist, and reduce the effectiveness of the programs such agencies offer to lower energy bills.

(v) The Energy Project has a direct and substantial interest in this proceeding, will assist the Commission in resolving the issues, and will not unduly broaden the issues or delay the" proceeding.

(vi) WHEREFORE, The Energy Project respectfully petitions the Commission for leave to intervene in this proceeding.

DATED, this 12th day of January, 2016.

Brad M. Purdy Attorney for Petitioner