

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS
CORPORATION,

Respondent.

DOCKET UG-240008

CASCADE NATURAL GAS CORPORATION

TWELFTH EXHIBIT TO THE
DIRECT TESTIMONY OF NOEMI ORTIZ

March 29, 2024

Comment/Recommendation/Questions	Context	CNGC Response	Update	Sent to EAG
Multi-Year Rate Case: Where is CNG in the process of developing a multi-year plan? Is there a target date to complete the plan? Is there a sample from past years we can look at?	Multi-Year Rate Plan shared during kick-off meeting to provide members to provide a high level overview of what we will be working on throughout our first year. Feedback was encouraged.	Charter was updated to reflect the target date for Multi-Year Rate Plan Sample? Charter & Multi-Year Rate Plan information is uploaded to the EAG Teams Group and can be accessed by EAG members via SharePoint.		
Charter: I would add that meetings will be recorded and how we can access the recording. I also suggest adding when EAG members can expect the stipend.	Equity Advisory Charter shared during kick-off meeting and feedback was requested from members.	Recommended changes made to Charter on 10/19/23		
The need for a professional Spanish translation of the CNG website that is not through Google Translate. It takes a lot more work and effort, but a lot is lost in translation and the end product is not beneficial to Spanish speaking customers. I know that the SLC provided Spanish translations for CNG for flyers in the past, but for a bigger project like the translation of the website, there should be a consideration for professional services since a website design is a bit more technical.	CARES program shared during Meeting#1 additional discussion held on website access and ease of use for non-English speaking individuals.	Director of Customer Experience and Team took feedback and recommendations from EAG members and explored website Translation Plugin on 10/20/23. Exploring options for higher quality translation services with Translate and Amazon Translate, currently use Translate. 10/30/23 Meeting held to pursue purchase of a higher quality, neural machine translation plug for all company domains. **We will start on a trial basis, see if it fits our needs, and adjust as needed. We would like to bring it to the group for those that may be bilingual and can provide further feedback. 11/16 work with the G Translate is happening to update domain.	11-30 Gtranslate implemented new translation platform. The new platform gives CNGC the ability to also make edits on the back end if the translation service is not providing adequate use of certain words and or the correct use of masculine vs. feminine nouns 12/5 I did a full review of website and we found that there is a need for some additional edits, largely in the use of masculine and feminine use of words. I am working with the customer experience team to fix those errors on our websites. In the mean time, we would like to ask if we have any members in the group that are able and willing to review the new translation platform and give us some feedback?	Home - Cascade Natural Gas Corporation (cngc.com)
CARES Income Eligibility: When I look at this table here, what is you know, I know it's federal something, right? So I think that there is some assumptions that there are well educated people out there that can understand these applications and can understand where their income of Social Security \$1700 or whatever, right. And there are two people, you know, they don't even know if they qualify, let alone go on the website and fill out the application. And all of that. So I think it's more cumbersome than some people believe it is and can be kind of a dismissive approach. And so, you know, when we're trying to say, OK, we're here to help you. Great. Now help us manage how we help the people that need this information. So part of my job is case management and so if I don't know if they qualify, I'm wasting an hour of counseling online trying to figure this out or in person on the phone. So that's why I'm like, where is this on the website so that I can help them individually, you know, picture Grandma, 7080 years old, mental health conditions, medical issues.	CARES program shared during Meeting#1 additional discussion held on self declaration of income for customers in order to reduce barriers in low-income program eligibility proceedings.	Director of Customer experience, the company believes in being transparent and providing all eligibility criteria on CNGC website for customers. All details are available including federal poverty levels and median income levels and ranges plus customers can call local agencies and receive the same information. 10/20/23	CNGC website was updated to add additional clarification of income eligibility guidelines for energy assistance programs. Further detail on types of incomes needed, table showing income tiers, further defining Federal Poverty Levels and Area Median Income to make user friendly. 10/27/2023	https://www.cngc.com/customer-service/low-income_assistance_programs/
As a third party provider for income verifications for other utility companies, it is good that CNG has self disclosure of income. A variety of customers can only access services by calling in or to submit paper applications. Not everyone is computer savvy or has access to technology to be able to navigate an online application process.	CARES program shared during Meeting#1 additional discussion held on self declaration of income for customers in order to reduce barriers in low-income program eligibility proceedings.	No response required.		
I applaud CNG for the various outreach methods implemented in trying to get the word out about the CARES program!	CARES program shared during Meeting#1 additional discussion held on multiple forms of outreach used to reach low-income customers in hard to reach areas in order to increase enrollment in programs and leverage relationships with partners.	No response required.		
Bill in Spanish: radio station? Sending customer tips? What we use?	Outreach hard to reach/serve communities	CNGC customer breakdown is provided in multiple languages including in Spanish on our website. We line by line and explain what each section includes along with tips and who to read your meter. 12/8		
When a home is being weatherized. Is there signage on the site that, "this work is being done through cng weatherization program for more info..." That would increase marketing and outreach in neighborhoods that may have others in need of support.	Outreach hard to reach/serve communities	EE Programs Manager: Yes, Agencies post signage at each site for each of their agencies, there are some agencies that have taken advantage of additional outreach funds and purchased sandwich boards. These have our CNGC logo plus Agency information.		
Considering a senior citizens who have worked their whole life and are now on some kind of retirement budget. Whether that Social Security, if they were lucky enough to save money, maybe they have a pocket of that. I understand we live in a capitalistic society where everything is about making money. And how do we do that? But there's also, you know, a I like the word CARES. But when I was on Medicaid going to school and raising my family and on a fixed income while I was in school and working, I still couldn't afford my heating bills and so I would get this grant and Seattle that would get \$1000 to buy oil, and it was literally a lifesaver because then I could spend the money I was making on working for food and other essentials. So when we're thinking about, you know, how do we make money as a company and raise the rate so that we can do these various projects, which I agree every company has the right to do that. How do you then address a population who's on a fixed income that their dollars aren't being raised every year? Right to meet these needs. And so if you're thinking about a senior citizen couple 75, you know they're not really in the internet world and applying every year, they may forget. And then they're, you know, not getting the medication so they can pay the gas bill and. And so it streamlining the vulnerable I feel is important and in places where gas is the only option to heat my home, even more outreach in those pockets of population, right. And I know some of the reservations, you know, they only have one option to heat their home. So how do you make sure that ongoingly they understand? Ohh, there's this pocket of money that will help me pay my heat bill and I don't have to necessarily apply for it every year, especially if I'm over 70 or you know, like some kind of guideline that is like fixed, you know, especially with people who have mental health issues. You know that even becomes more of a challenge, and if you have dementia, it's even more of a challenge.	What do you believe we as a company should be thinking of and or taking into consideration throughout the IRP process to mitigate barriers?	Connect with customer experience director Dan Tillis discuss bill discount program and current offering on auto enrollment potential for customers who are on fixed income. Is this already happening? Is this something the company can potentially do? 1/8	Auto enrollment: company 2022-2023 Cares all date assist portal LIHEAP, WEAFF. Agencies to check income and cross reference eligibility auto enroll in correct tier, 2600 customers. Fixed income customers, advisory groups meet and have a discussion, agencies. revisit that appear, mechanism to ensure update. (k) Any customer may designate a third party to receive a disconnection notice or notice of other matters affecting the customer's service. The utility must offer all customers the opportunity to make such a designation. If the utility has reasonable grounds to believe that a customer is not able to understand the effect of the disconnection, the utility must take reasonable steps to ascertain whether a third party, such as DSHS or other social services agency, is responsible for the customer's affairs. In either circumstance, the utility must delay service disconnection for at least five business days past the original disconnection date after issuing a disconnection notice to the third party. The utility must determine which social services agencies are appropriate and willing to receive the disconnection notice and the name and/or title of the person able to deal with the disconnection, and the utility must provide that information to the customer.	
I believe the biggest barrier to people impacted by lack of resources is income and lack of choice.	What do you believe we as a company should be thinking of and or taking into consideration throughout the IRP process to mitigate barriers?	There are a large number of resources the company is offering to its customers and it sounds like it may not be a lack of resources and more communications and outreach effort enhancement needed with Agencies in the community. Training opportunity, internal and external partners. List all potential resources available to customers, targeted outreach. Connect with Customer experience Team and EE Outreach Specialist to build a comprehensive outreach training program. Targeted outreach for customers WEAF Arrears CARES Weatherization Energy Efficiency Rebates		
I think depending on the customer this information may get mixed reactions. It may be understood and accepted or confusing for those who do receive and read the notices. I believe it will be important to explain the CCA, charges and credits in various ways, not only with words but also with an infographic and short video clip. Those who are not signed up for CARES may ask why am I responsible for this new fee, why is it not covered by the utility? Those in CARES may see the credits applied and may not give much concern as long as their bill is not increasing. Both may want to know if this is a recurring charge or one-time charge and if the charges will change overtime.	The CCA includes both costs and benefits. How do you expect your community to react to the CCA charges and credits? What questions do you think the community you represent or serve will have about the CCA charges and credits on their bills?	Bill Insert sent out with March 1st bill with CCA information explaining both the Climate Act Fee and Climate Act Credit.	Climate Commitment Act - Cascade Natural Gas Corporation (cngc.com)	
Have you connected w/ areas where individuals apply for social services? Where they apply for medicaid, where individuals sit for long periods of times and hav time to read?	Outreach hard to reach/serve communities Updates (ongoing)	We have been in contact with the Department of Social and Health Services and will be providing our bill discount program information, Weatherization information and our IRP how to get involved for their resources board. We are also in contact with the unemployment office to continue program awareness.		

<p>The need for a professional Spanish translation of the CNG website that is not through Google Translate. It takes a lot more work and effort, but a lot is lost in translation and the end product is not beneficial to Spanish speaking customers. I know that the SLC provided Spanish translations for CNG for flyers in the past, but for a bigger project like the translation of the website, there should be a consideration for professional services since a website design is a bit more technical. (Ongoing)</p>	<p>Website translation updates</p>	<p>Website update, we are working on translating our PDFs. The focus has been spanish translation up to this point. So far we have connected with another vendor used by a partner utility, we are looking at options such as translating top languages spoken in our communities/service territories. An option of translating per request, making Spanish documents automatically available and all other languages by request only. This process is ongoing and we will continue to keep you all updated on Company progress.</p>		
<p>I think in the beginning the process may not have a lot of detail and I think if you wait later on in the IRP process you would have something tangible to share and to receive feedback from. I think that early in the planning process may be a little bit too early.</p>	<p>When should the Company seek customer feedback, early planning process vs. Later in the IRP process?</p>			
<p>Might be good to connect with the Nuestra Casa and lower valley as well as Catholic family Charities those are places that a lot of the families will frequent especially monolingual families looking for access to information. So I would definitely check out those places, Rods house that's a space, job incentive for LGBTQ youth as well they have tons of programs geared towards youth and young adults and also they do have a couple of shelters where I know that it'd be something they could post any of their information. Other areas to may be senior centers and or food banks.</p>	<p>Recommendation on where we may be able to hold our IRP meetings to make them more accessible to underrepresented communities?</p>			
<p>We will definitely find a way to share, we don't put up Flyers up but we do have a section where we can have different types of resources and the list of resources and also use that for when we assist families with our sliding scale things that we have for our clinic. Clinic/Hospital would get a copy of the pamphlet and flyer then I work with my marketing director and then we can definitely then distribute those after you it goes through our marketing and our CEO and then we could distribute that so there is a process for that, but it is doable.</p>	<p>How to best promote IRP meetings?</p>			
<p>Follow-up w/ Amanda on Nuestra Casa for Childcare recommendation. Awaiting potential recommendations from EAG members.</p>	<p>Recommendation for childcare service professionals we may be able to hire for these meetings?</p>			
<p>Awaiting potentially recommendations from EAG members</p>	<p>Potential recommendation for Spanish translator during these meetings and or EAG member interested in translating?</p>			
<p>I agree, are these outside meetings for anyone in the community or just specific people? because yes you know especially our monolingual population and they're not going to know certain things that potentially will be discussed other than you know their biggest general question which would probably be you know what are the discounts what are the qualifications those kind of things.</p>	<p>Level of detail to share during of IRP meetings, how to tailor the meetings, expectations?</p>			
<p>Have you connected with people for people? They do a lot of community programs as well and a lot of people utilize them especially for the people for people bus just some thoughts because I know a lot of the low income families do utilize them quite often</p>	<p>Outreach hard to reach/serve communities. Additional Communications (ongoing)</p>	<p>We do not have a contact for people for people, however if Amanda if you have a contact we will reach out. (Amanda to share PFP contact)</p>		
<p>Would it be possible for cascade to share copies of like the social media posts and bill inserts? Just so we can kind of like see what that messaging look like because I imagine a lot of people here would have a lot of comments if maybe if you know maybe they could respond or provide tips on how to make the bill inserts a bit more useful.</p>	<p>Outreach hard to reach/serve communities. Additional Communications (ongoing)</p>	<p>Information to be sent out after EAG meeting.</p>	<p>Slide deck with additional questions, bill insert, links to website with CARES and CCA information provided on 3/11/24</p>	<p>https://www.cngc.com/rates-services/climate-commitment-act/ https://www.cngc.com/customer-service/low-income_assistance_programs/</p>