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November 15, 2023

Director Kathy Hunter
Acting Executive Director and Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Received
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Re: Advice No. W23-11-01, Schedule 301, Cascade Low-Income Weatherization Incentive Program

Dear Director Hunter,

Cascade Natural Gas Corporation (Cascade or Company) files revisions to the following sheets in its Tariff WN U-3, stated to become effective January 1, 2024:

Seventh Revision of Sheet No. 301
Fifth Revision of Sheet No. 301-A
Second Revision of Sheet No. 301-B

The purpose of this filing is to make housekeeping changes to Schedule 301, Cascade Low-Income Weatherization Incentive Program. Most of the proposed changes are made to align the Schedule with the formatting of the Company's other tariff sheets. Below is a description of each revision:

Sheet No. 301

- The Availability section is revised to clarify that the program is available to qualifying Cascade customers.
- A Program Administration section is added to state the program is administered by Department of Commerce-approved Low -Income Weatherization providers and other Low Income Agencies providing weatherization services.
- Under Program Description, the language is revised to clarify that rebates are for Cascade customers.
- Information regarding program rebates is placed under a new header, WIP Rebates, separating rebate information from eligibility information.
- References to the Enhanced Weatherization Program (E-WIP) and E-WIP rebates are removed as the offering, which was piloted and is now a standard part of WIP, is being consolidated by reference as WIP. As currently approved, Schedule 301 pays the cost-effective job costs through

the WIP rebate and any remaining job costs through the E-WIP rebate. For ease of communicating the program as well as for simplified program administrations, both rebates will be offered simultaneously through WIP.

- Language requiring a memorandum of understanding (“MOU”) with agencies is moved to Sheet 300-B under General Provisions.
- In the Energy Efficiency section, references to efficiency standards are removed as they are apt to change. Instead, a reference to high efficiency measures is included.

Sheet 301-A

- The Energy Efficiency Measures section is revised in the following manner:
 - The reference to the Weatherization Priority List is revised to Deemed Measure Priority List (DMPL), which is the correct, current title of this document.
 - Language is added allowing agencies to demonstrate that a measure is cost effective by using the Department of Energy (DOE) Priority List.
 - The Company’s avoided cost is removed as a means for demonstrating a measure’s cost effectiveness as the DMPL and the DOE Priority List are inclusive resources and should be more time efficient to use.
- The Rebate Calculation and Payment section is renamed simply Rebate Calculation, and the information in this section is revised to consolidate the WIP and E-WIP offerings, which means the two-step process of calculating the cost-effective portion and the remaining portion of the project cost is no longer required. Currently, WIP and E-WIP, in combination, cover total project costs. As modified, WIP rebates will cover total project costs.
- A section header is added for information on Agency Fees.
- Upon request from the agencies, the project coordination fee is increased from 20% of the total project cost to the 30%. The agencies expressed concern that WIP program funding is not sufficient to pay labor costs associated with audits, inspections, intakes, rebate applications, and managerial review of project paperwork. The Company believes this change is necessary to enable qualifying customers to access weatherization services.
- Again, references to E-WIP are removed.

Sheet 300-B

- The General Provisions section is revised to break each term into a separately numbered point.
- The requirement for an Agency to have a current, executed MOU with the Company is moved to this section.

In October 2023, the Company shared this draft filing with the Company's Advisory Group, providing them with more than thirty days to consider the proposed revisions. The Company received no objections to its proposed changes.

This filing is comprised of the following files:

NEW-CNGC-Advice-No.-W23-11-01-CLtr-11-15-23.pdf

NEW-CNGC-Advice-No.- W23-11-01-Trf-11-15-23.pdf

Please direct any questions regarding this filing to Jennifer Gross at (509) 975-9473.

Sincerely,

/s/ Lori Blattner

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Attachment