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March 25, 2020

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: **Cascade Natural Gas Response to COVID-19**

Dear Mr. Johnson:

Cascade Natural Gas Corporation (Cascade) is providing this update to summarize communications that have previously been sent to the Commission regarding actions taken in response to and in preparation for the COVID-19 pandemic

Cascade is working to minimize the risk for its employees while continuing to provide safe and reliable service to its customers. The Company is prepared to continue operations on a 24/7 basis.

MDU Utilities Group, comprised of Cascade Natural Gas Corp., Intermountain Gas Company, Montana-Dakota Utilities Co., and Great Plains Natural Gas Co. (Utilities Group), formalized a Workplace Pandemic Preparedness Plan on March 6, 2020. Within that Plan a Pandemic Task Force was created and is continually monitoring the ever-changing situation, meeting at least three times each week, and providing communication for employees, customers, vendors, etc.

The Utilities Group has instituted certain measures to help protect employees from exposure to COVID-19 and to curb the potential spread of the virus in customer homes and facilities. We are closely following recommendations from the Center for Disease Control and Prevention (CDC). This includes recommendations on social distancing.

The following additional changes have been put into place:

- The Customer Service Hours have been changed to 8:00 am to 5:00 pm local time.
- Customer disconnections of service for non-payment have been suspended until further notice.
- Late-payment charges will be suspended effective April 1, 2020. We appreciate the quick approval from the Commission to accommodate this change.
- The Company continues to evaluate non-emergency service work and is suspending the following types of service orders, temporarily, which we feel are not critical work during this pandemic, further protecting our employees and customers:

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- Check customer equipment – Usually includes re-reading the meter and/or checking appliances and equipment in the home.
- Exchange meter, remove existing meter, and test meter –Usually to test the existing meter for accuracy. Requires relighting of customer’s appliances after the new meter is set.
- Investigate high bill concerns – Includes rereading the meter and/or checking appliances and equipment in the home.
- Turn Off Meter – The Company will read out the meter for final billing but leave the gas on.
- Check Meter or ERT – Non-emergency checks of the meter or ERT will be suspended.
- Check ERT/Re-program – Used to check to ensure ERT read matches the meter index and that it is programmed correctly.
- The Company began evaluating changes necessary to facilitate employees working from home during the week of March 2, 2020. As of March 23, 2020, only employees identified as critical to do so will be working from an office, all other employees will be working from home. This includes approximately 60 customer service agents that have been set up to work from home.

Emergency calls will continue to be serviced on a 24x7 basis taking into consideration social distancing.

At this time, the Company has not identified any issues with its necessary vendors. Cascade has been in contact with all of its transportation pipelines as well as the Company’s natural gas marketers. Each of these entities has implemented its own pandemic preparedness plan to ensure continued safe, reliable deliveries of natural gas to Cascade’s system throughout this event.

Natural Gas Control Room

The following has been implemented in the control room to ensure continuity of operations and maintain the health of the gas control personnel:

- Following CDC direction, the controllers have implemented social distancing, frequent handwashing, respiratory etiquette, surface and equipment cleaning, and observing “stay at home if sick” policy.
- Control room surfaces and equipment are sanitized frequently throughout the controller’s shift and at shift change
 - Control room is stocked with sanitizing products
- Non-essential building office staff have been relocated to working from home
- The control room is locked down and not accessible by non-gas control staff
- Controller team isolation has been implemented—only the on-duty board operator is in the control room
 - Supporting gas control staff are working remotely from home
- 6 gas controllers work rotating 12-hr shifts to monitor facilities 24/7
 - 4 controllers can comfortably staff the established shift rotation and ensure adequate time off
 - 3 additional emergency controllers have been identified, bringing the total staff available to 9.

- Back up emergency controllers are isolated and working remotely
- Control room has a stocked self-contained kitchenette

The Utilities Group is following the guidelines of the CISA Essential Critical Infrastructure Workforce (Version 1.0 dated March 19, 2020 is provided as Attachment A). The guidance provided is intended to support state, local and industry partners in identifying the critical infrastructure sectors and the required essential workers. The Utilities Group appreciates your assistance in ensuring that its critical natural gas personnel as identified in the attached document are provided access to customers and its facilities in the event of a state or local lock-down.

The Utilities Group is coordinating with state and local authorities throughout this process as well as coordinating with national organizations such as the American Gas Association, Northwest Gas Association and other utilities.

The Utilities Group is prioritizing the safety of its employees and service to its customers. Cascade will continue to provide updates to this Commission in this ever-evolving situation.

Please do not hesitate to contact us if you have questions or require additional information.

If you have the need to reach us regarding an after-hours emergency, please contact Mr. Gilchrist or myself.

Primary:

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Secondary:

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Mark Chiles: 208-863-5738

Vice President – Regulatory Affairs & Customer Service

Sincerely,

/s/ Garret Senger

Garret Senger

Executive Vice President, Regulatory Affairs, Customer Service and Administration

CC: Nicole Kivisto

Mark Chiles

Pat Darras

Mike Parvinen

Attachments