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December 14, 2021

Ms. Jennifer Snyder,

Cascade Natural Gas Corporation appreciates the opportunity to submit comment regarding Docket UE-210804, RE: Developing a Commission jurisdictional specific cost-effectiveness test for distributed energy resources incorporating CETA.

Although this docket pertains primarily to changes to electric utility planning associated with the 2019 Clean Energy Transformation Act (CETA), the Company would like to respond to the following question identified in the WUTC’s Notice of Opportunity to File Written Comment.

- 5) This Docket is focused on electric utility system cost-effectiveness changes due to CETA. Although CETA does not apply to gas utility systems, other recent policy changes indicate a need to examine current cost-effectiveness practices. Please describe the advantages and disadvantages of addressing both electric and natural gas cost effectiveness in this Docket to ensure a consistent framework is used.**

Cascade agrees that additional discussion is needed regarding current cost-effectiveness practices for both electric and gas utility systems. While there are intersections in the valuation of decarbonization opportunities for both electric and gas distribution companies, it’s important that sufficient time and attention be dedicated to specifically addressing gas utility demand side and decarbonization opportunities as they pertain to the Clean Buildings Act, and emerging Climate Commitment Act.

We encourage the Commission to consider convening a separate docket for gas utilities dedicated to the design of a jurisdictional cost test that ensures thorough valuation of energy efficiency and integration of low/no-carbon gaseous fuels. Because of the benefits associated with the use of low carbon gaseous fuels, and their applicability to decarbonization of the electric grid under CETA, inputs associated with these benefits could begin to be considered as part of Docket UE-210804. In such a case, it will be important that sufficient time be dedicated under the current docket to examine this specific *aspect* of cost-

effectiveness valuation, which would then be considered as part of a dedicated docket to explore appropriate cost-effectiveness practices specific to the gas utilities.

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

Thank you for your consideration.

Respectfully Submitted,

/s/ Lori A. Blattner

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