

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS
CORPORATION,

Respondent.

DOCKET UG-240008

THE ENERGY PROJECT'S REQUEST
FOR CASE CERTIFICATION AND
NOTICE OF INTENT TO REQUEST A
FUND GRANT

1 Pursuant to RCW 80.28.430, and the Washington Extended Interim Participatory Funding Agreement (Funding Agreement) approved by the Washington Utilities and Transportation Commission (Commission),¹ The Energy Project (TEP) hereby submits this Request for Case Certification and Notice of Intent to Request a Fund Grant.

2 Notice of Intent to Request Fund Grant. Pursuant to Section 6.2 of the Funding Agreement, TEP provides this Notice of Intent to Request a Fund Grant from the Customer Representation Sub-Fund of the Consumer Access Fund for Cascade Natural Gas Corporation (Cascade).²

3 Eligible Proceeding. Cascade is designated as a “Participating Public Utility” in Article 1(g) of the Funding Agreement. Cascade’s General Rate Case constitutes an “Eligible Proceeding” under Article 1(c). This case will be carried out under the auspices of Washington’s public service laws and Commission regulations.³ Cascade’s General Rate Case will materially affect the public interest.

¹ Docket U-210595, Order 02 (February 9, 2023).

² See Funding Agreement § 6.2.

³ See, e.g., Order 01 Protective Order (Feb. 15, 2024).

Request for Case Certification. The Energy Project requests case-certification in this matter as a customer representative organization pursuant to section 5.2.1 and 6.2 of the Funding Agreement. The Energy Project meets the criteria for case-certification found in section 5.2.1.⁴

- a. Non-Profit. TEP is fiscally sponsored by the Washington State Community Action Partnership, a non-profit organization.
- b. Broad Customer Interests. TEP represents the interests of vulnerable populations, including thousands of low-income customers in the State of Washington. RCW 80.28.430(1) recognizes “organizations representing low-income . . . customers” as a type of organization that represents “broad customer interests in regulatory proceedings.”
- c. Effective Representation. TEP focuses its regulatory engagement on issues that have a material impact on low-income customers and vulnerable populations. TEP works generally with utilities and other stakeholders to develop and expand rate assistance, energy efficiency programs, greenhouse gas reduction programs, and other matters impacting low-income customers and vulnerable populations in Washington. TEP serves on Cascade’s low-income and energy efficiency advisory committees. TEP also works with entities delivering low-income services that are funded by the Washington State Department of Commerce, including Community Action Agencies that provide rate assistance and energy efficiency programs for low-income customers. Through intervention and participation in Commission proceedings concerning rates, mergers, property transfers, policy statements, and rulemakings over the past two decades, TEP has effectively represented and directly and materially benefited low-income customers and vulnerable populations, including Cascade’s customers. TEP can continue to effectively represent the interests of low-income customers and vulnerable populations in this proceeding.

⁴ TEP met the case certification requirements in various proceedings. See, e.g., *WA Utils. & Transportation Comm. v PacifiCorp*, Dkt. UE-230172, Order 04 Granting Requests for Case Certification, ¶¶ 17-18 (May 25, 2023).

- d. Adequacy of Representation. The Energy Project is the only party focusing solely on the interests of low-income customers in this proceeding. The activities described above demonstrate that TEP can effectively advance the specific interests of low-income customers and vulnerable populations, as well as the general public interest in fair, just, reasonable, and equitable utility rates and practices.
- e. No Delay. The Energy Project will participate in discussions among the parties concerning the procedural schedule for this proceeding. As demonstrated by the track record described above of participating in general rate cases and other significant proceedings before the Commission, TEP's participation will not unduly delay this proceeding.

5 For the foregoing reasons, TEP respectfully requests that the Commission grant this Request for Case Certification and accept its Notice of Intent to Request a Fund Grant.

DATED: April 17, 2024

By: /s/ Yochanan Zakai

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