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Director Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities & Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Re: Docket U-210553 – Cascade Natural Gas Corporation Comments

Director Maxwell:

Cascade Natural Gas Corporation (“Cascade” or “Company”), hereby submits the following comments in Docket U-210533, in accordance with the Washington Utilities and Transportation Commission’s (“Commission”) Notice of Opportunity to File Written Comments (“Notice”) on the SSG dashboard and general comments, issued May 31, 2023.

Cascade has three main concerns regarding the SSG evaluation and resulting Dashboard. The following three concerns are interlinked and will lead to a final report that parties should be given the opportunity to comment on:

1. General lack of transparency
2. Lack of supporting documentation
3. Incomplete conclusions

### **General Lack of Transparency**

The process from the beginning has been fraught with transparency issues. SSG has provided opportunities on several occasions for participants to provide input via a Miro Board; however the process was cumbersome and it is unclear if any feedback was incorporated into any analysis. Participants continually requested supporting documentation with no response until the incomplete Dashboard was presented.

### **Lack of Supporting Documentation**

The Dashboard shows summary conclusions but supporting figures are hardcoded and lack detail regarding where they were derived or originated. Without details and

supporting documentation it is not possible to verify or provide meaningful feedback on any conclusions derived. From the beginning, participants requested supporting documentation and calculations, but nothing was ever provided to properly evaluate the conclusions presented in the Executive Summary.

### **Incomplete Conclusions**

Without the proper supporting documentation and detailed calculations any conclusions drawn cannot be verified, supported, or refuted. Meaningful feedback is not possible at this point.

SSG was tasked with demonstrating costs and benefits associated with pathways to decarbonization. This task has not been undertaken or completed. The alternatives identified have really gone no further than identification, with antidotal impacts, and with no supported conclusions.

Cascade appreciates the opportunity to provide comments on the process and the SSG Dashboard.

If you have any questions, please direct them to me at (509) 528-9223.

Sincerely,

*/s/ Michael Parvinen*

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