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Ms. Amanda Maxwell,

Cascade Natural Gas Corporation (Cascade) appreciates the opportunity to submit comment regarding the Washington Utilities and Transportation Commission’s draft Request for Proposals (RFP) associated with Docket U-210553, Relating to the Commission’s Examination of Energy Decarbonization Impacts and Pathways for Electric and Gas Utilities to Meet State Emissions Targets.

After reviewing the draft RFP, the Company has the following questions and observations.

- 1) In section 1.1, WUTC states that “AGENCY reserves the right to amend the services based on the qualifications of respondents to this RFP.”

Current details regarding the scope of work are limited, so it is unclear whether this references the current RFP, or a scope later developed as part of the public process. In either case, Cascade would recommend making all non-confidential bid/proposal information available for stakeholders to review, and providing an opportunity for stakeholders to provide comment or recommendations on the potential consultants.

In the event the WUTC anticipates material changes to the scope of services based on respondent qualifications, Cascade encourages the Commission to share any such amendments with the public in advance of changes being made and to seek feedback as part of the public process.

- 2) There are several references (beginning in section 1.2) to the WA State Department of Health “providing information regarding the public health impacts of decarbonization strategies or modeling provided by investor-owned utilities regulated by AGENCY.”

Based on these sections of the RFP, it appears that the WUTC anticipates utilizing the WA State Dept of Health to potentially perform health impact studies or analysis as part of this examination. Cascade would like to better understand how this analysis will be approached as part of the scope outlined in the budget provisio. We would encourage the WUTC to make the scope of any supplementary Health Department study (and any other associated studies) public and include opportunities for public engagement consistent with other areas of this analysis.

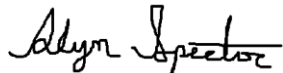
- 3) The RFP notes that “AGENCY currently anticipates that AGENCY staff will facilitate engagement with utility representatives, industry stakeholders, and public interest groups, and the contractor will support engagement with members of the public and community-based organizations, among others.”

While the Company has no specific recommendations or concerns regarding this division of labor, we would encourage the WUTC to share additional details regarding how this split engagement would operate from a practical implementation standpoint, and the desired outcome of this separation of duties.

- 4) Cascade encourages the WUTC to weight its preference towards contractors with demonstrated Northwest-specific experience regarding energy reliability and resource adequacy issues, as well as electric transmission/distribution system modeling. This will ensure that findings are based on an understanding of the unique challenges and opportunities associated with our region, and support the identification and implementation of regionally appropriate solutions.

Cascade again appreciates the opportunity to submit comment on the draft RFP associated with this docket.

Respectfully Submitted



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Cascade Natural Gas Corporation