

**Exh. JG-3  
Docket UG-240008  
Witness: Jana Grenn**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**CASCADE NATURAL GAS  
CORPORATION,**

**Respondent**

**DOCKET UG-240008**

**EXHIBIT TO  
TESTIMONY OF  
JANA GRENN**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

***CNGC's Response to UTC Staff Data Request No. 61***

**September 25, 2024**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UG-240008  
Cascade Natural Gas Corporation  
2024 General Rate Case**

**WUTC STAFF DATA REQUEST NO. 61:**

**Re: Energy Justice and Equity**

Ortiz’s testimony states at Page 4, Lines 9-10 that “Cascade realized it needed to internalize equity.” What steps has the Company taken since the issuance of Order 09 in Docket UG-210755 to promote equity within the company?

**Response:**

Order 09 in Docket UG-210755 was issued August 23, 2022. Just prior to the issuance of Order 09, on May 31, 2022, Cascade Natural Gas Corporation (“Cascade”) procured its Low-Income Needs Assessment (“LINA”) study to identify its low-income customers in Washington. In the second quarter of 2022, Cascade posted the position for the Manager of Energy Efficiency Programs, which is assigned oversight of equity at Cascade. In October 2022, Noemi Ortiz was hired as the Energy Efficiency Programs Manager.

In 2023, Cascade began mapping the highly impacted communities (“HIC”) in its service territory and correlating HIC status with billing data to identify correlations or trends that may point to inequities. Cascade further mapped the census tracts that were deemed most apt to be low-income per the Low-Income Propensity Model, which the Company procured from a third-party consultant to aid in the redesign of its bill assistance program. This work was started to implement recognition justice, identifying which customers may be experiencing inequities.

In 2023, Cascade performed extensive research on the vulnerable, overburdened, and highly impacted populations within its service territory. It identified the 14 most disadvantaged communities and instigated an outreach campaign, targeting people who would be willing to represent subsets of disadvantaged or vulnerable populations within these 14 overburdened communities on Cascade’s Equity Advisory Group (“EAG”). After performing outreach and interviewing applicants, seven representatives were selected for Cascade’s EAG. The EAG was designed to provide a space for underrepresented communities to provide input into the Companies’ decision-making processes and began meeting monthly in September 2023.

Since the EAG is new, many of the meeting agenda topics have been informative to assist members in understanding the industry-specific processes, jargon, and filings. For instance,

Cascade has provided overviews of the multiyear rate plan, the integrated resource plan, and commission investigations, among other things.

The EAG provided useful, actionable feedback to Cascade in 2023. Based on conversation with the EAG, Cascade improved the accessibility of its customer communications for linguistically isolated customers. The Company's webpage is now accessible in multiple languages; translated materials have been improved so that they are not merely word for word translations, but concept by concept translations, for improved readability. Cascade continues to work on improving its communications based on 2023 EAG feedback, including working on providing all pdfs posted on the Company's website in both English and Spanish. This is discussed in the direct testimony of Daniel L. Tillis, Exh. DLT-1T.

In 2023, Cascade also worked diligently with its CARES Advisory Group to implement its bill discount and arrearage relief program on October 1, 2023. Cascade continues to work with its advisory group to improve the program and enable customers with need to access program. One means Cascade has used is to partner with Community Based Organizations ("CBO") for outreach so that hard-to-reach customers can be reached through trusted messengers. Cascade's work with CBOs is discussed in the direct testimony of Daniel L. Tillis, Exh. DLT-1T.

In 2023 and 2024, Cascade has remained active with its various advisory groups for the Company's integrated resource plan, the conservation programs, and the low-income discount program (CARES). Cascade is also continuing to refine the work it has started, including reviewing the HIC and billing data correlations and improving communications for hard-to-reach customers. The Company is researching methods to use to weigh the outcomes of pipeline projects located in vulnerable communities. Cascade also continues to meet monthly with its EAG, discussing current regulatory topics and deepening its engagement with the community representatives.

Cascade's Vice President Regulatory Affairs and Customer Service has executive oversight of the Company's ongoing equity efforts. He recently provided training to the Company's officer team on incorporating an equity lens into all the Company's efforts. As a result, the Company is currently working on developing training that can be rolled out to the Company's senior leaders beginning in the first quarter of 2025.

The Company is also doing the research and targeted outreach necessary to form an EAG to represent its Oregon customers. This will further support the Company's movement toward making the application of an equity lens a company-wide perspective.