UG-210590



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April 29, 2022

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket UG-210590 - Relating to the Commission's proceeding to develop a policy statement addressing alternatives to traditional cost of service rate making.

Dear Ms. Maxwell:

Cascade Natural Gas Corporation ("Cascade" or "Company") hereby submits the following written comments to the Washington Utilities and Transportation Commission ("Commission") in regards to Phase 1 of Docket U-210590 and in response to the April 7, 2022 Notice of Virtual Workshop which focuses on the creation of a "policy statement addressing alternatives to traditional cost of service ratemaking".

The Company agrees with the previous written comments submitted to this docket by Avista Corporation and Puget Sound Energy in their comments dated April 22, 2022 and April 27, 2022, respectively.

Cascade would like to emphasize that safety, customer experience, affordability, utility performance and utility financial performance should serve as guideposts for overall outcomes of any alternative ratemaking policy. Additional design principles in the development of metrics related to the incentives for utility behaviors and achievements would be ensuring that such metrics are relevant, controllable, targeted, efficient, prioritized, clear, comparable, quantifiable, verifiable, and adaptive with time.

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

Sincerely,

/s/Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
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Attachments