

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS
CORPORATION,

Respondent.

DOCKET UG-210755

REQUEST FOR PAYMENT OF FUND
GRANT OF THE ENERGY PROJECT

- 1 Pursuant to the Washington Interim Participatory Funding Agreement (Funding Agreement),¹ approved by the Washington Utilities and Transportation Commission (Commission) in Order 01 in Docket No. U-210595, and Order 06 Granting Requests for Case Certification and Order 08 Approving Proposed Budgets in Docket No. UG-210585, The Energy Project (TEP) hereby respectfully requests payment of a Fund Grant from the Customer Access Fund for Cascade Natural Gas Corporation (Cascade)² in the amount of \$30,250.00. In support of this request, TEP states the following:
- 2 On September 30, 2021, Cascade filed its request for a general rate revision for natural gas distribution service in Washington. In its filing, Cascade requested to increase its annual revenue requirement by approximately \$13.7 million. On October 19, 2021, TEP timely intervened.
- 3 The Commission approved the Funding Agreement with an Effective Date of January 1, 2022. Section 7.3 of the Funding Agreement provides that “Eligible expenses may include costs incurred in relation to a proceeding for which a Participating Organization has an approved budget, but which were incurred prior to the Effective Date of this Interim Agreement.”³

¹ Docket U-210595, Order 01, Approving Agreement with Modifications (Feb. 24, 2022).

² See Funding Agreement § 4.2.

³ Funding Agreement § 7.3.

4 On March 17, 2022, TEP filed a Request for Case Certification and Notice of Intent to Request a Fund Grant (Notice and Request). On March 25, 2022, the Commission approved TEP's request.⁴

5 On April 21, 2022, TEP filed a Proposed Budget and requested a Fund Grant in this docket in the amount of \$30,250 to partially offset the costs of its participation in the proceeding. The Commission approved TEP's Proposed Budget for a Fund Grant in the amount of \$30,250 on June 13, 2022.⁵

6 TEP focused on all matters having an impact on Cascade's low-income and vulnerable customers, including low-income assistance program funding and design, low-income weatherization, billing, credit and collection issues, arrearage management, COVID-19 impacts and costs, reporting requirements, and Cascade's revenue requirement. Specifically, TEP identified three areas where improvements in the design and administration of the Washington Energy Assistance Fund (WEAF) program will promote equity, proposed a partnership with organizations based in and trusted by vulnerable communities, and recommended the Commission to not approve the Settlement because it failed to address the needs of low-income customers and vulnerable populations, or to promote equity.

7 TEP respectfully submits that this request for payment satisfies the requirement of the Funding Agreement Section 7.1 as follows:

- a. Section 7.1(a). The itemized expenses, payees and hourly rates for amounts to be reimbursed, including billing details, and including separately identified amounts for consultant or expert fees and travel expenses are attached as Confidential Exhibit A.
- b. Section 7.1(b). TEP was a full and active participant in this docket and the expenses are reasonable and directly attributable to issues and positions pursued on behalf of low-income customers and vulnerable populations, including efforts to develop and expand rate assistance, energy efficiency programs, and other matters impacting low-income

⁴ Order 06, Granting Requests for Case Certification (Mar. 25, 2022).

⁵ Order 08, Approving Proposed Budgets (June 13, 2022).

customers. As the only party focusing solely on the interests of low-income customers in this proceeding, TEP issued and reviewed discovery, participated in a settlement conference, participated in several prehearing/status conferences, filed testimony opposing the settlement between Commission Staff and Cascade, reviewed testimony of other parties; prepared for and attended an evidentiary hearing and filed a closing brief. The expenses included in Confidential Attachment A are Eligible Expenses as defined in Funding Agreement Section 7.3 and are reasonable and directly attributable to TEP's participation in UG-210755 on behalf of low-income customers and vulnerable populations.

- c. Section 7.1(c). The Commission requested that TEP “describe fully what a fellow is and how they contributed” to TEP’s advocacy in this case.⁶ Shute, Mihaly & Weinberger LLP runs a fellowship program that employs junior attorneys. Accordingly, the title of certain junior attorneys is “Fellow.” Ms. Stacy Lee, a fellow at Shute, Mihaly & Weinberger LLP, entered an appearance in this case and contributed to TEP’s advocacy.⁷ Ms. Lee performed research on issues addressed in TEP’s testimony, composed outlines of various pleadings and testimony, and drafted various pleadings and testimony for TEP.
- d. Section 7.1(d). This request is a final request for payment under this Approved Fund Grant for the full amount of the Approved Fund Grant.
- e. Section 7.3. All of the expenses included in Confidential Attachment A are Eligible Expenses as defined in Section 7.3 of the Funding Agreement.

8 Upon approval of this request for payment by the Commission, please send payment to TEP as follows:

The Energy Project
Opportunity Council Administrative Office
PO Box 2134, Bellingham, WA 98227

⁶ Order 08, Approving Proposed Budgets, at 4 (footnote 12).

⁷ Notice of Appearance of Stacy Lee on Behalf of The Energy Project (Dec. 7, 2021).

9 TEP has satisfied the terms of the Funding Agreement and respectfully requests that the Commission approve payment of TEP's Fund Grant in the amount of \$30,250.00 from the Cascade Customer Representation Sub-Fund within 30 days of receiving this Request for Payment as provided in Section 7.6 of the Funding Agreement.

DATED: October 24, 2022

By: /s/ Yochanan Zakai

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