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October 28, 2022

SENT VIA WEB PORTAL

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

Re: *Washington Utilities and Transportation Commission v. Cascade Natural Gas Corporation*, Docket UG-210755
Expressing Public Counsel Support for the PP EDIT Resolution

Dear Amanda Maxwell:

Cascade Natural Gas Corporation (Cascade or the Company) issued refunds to its customers after its federal tax rate was reduced due to implementation of the Tax Cuts and Jobs Act. The Internal Revenue Service (IRS) later concluded that the Washington Utilities and Transportation Commission (UTC or Commission) had ordered utilities, like Cascade, to refund too much to customers. The Commission then ordered Cascade and other interested parties, including the Public Counsel Unit of the Washington Attorney General's Office (Public Counsel), to work together on a method to collect from customers the excess refunds.

Public Counsel, which represents the interests of residential and small business ratepayers, participated in the collaborative process and advocated for several improvements to the plan originally proposed by Cascade; improvements that are now part of the plan submitted last week to the Commission. Specifically, the proposed plan now extends the time period of customer repayment to three years (from one), implements the repayment after the winter heating season, and uses the lowest interest rate. Public Counsel remains concerned, however, that ratepayers are

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being forced to bear the financial burden of a mistake over which they had no control. For this reason, Public Counsel takes no position on whether the Commission should approve Cascade's compliance filing.

Sincerely,

/s/ *Ann Paisner*
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Assistant Attorney General
Public Counsel Unit
(206) 521-3211

ANHP/bch
Enclosures
cc: Service List (via E-mail)