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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

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October 22, 2021

VIA UTC WEB PORTAL

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
Lacey, WA 98503

Re: *Tariff Revision, Schedule 304, Temporary COVID-19 Residential Bill Assistance,*
Docket UG-210801

Dear Director Maxwell:

On October 20, 2021, Cascade Natural Gas Company (“Cascade” or “Company”) re-filed tariff revision to implement changes to its COVID-19 Residential Bill Assistance program, known as Big HEART. Cascade consulted with the Washington Energy Assistance Fund Advisory Group and answered questions about the need for this filing. The Public Counsel Unit of the Washington State Attorney General’s Office (“Public Counsel”) appreciates the opportunity to comment on this filing.

Public Counsel’s Recommendation

Public Counsel recommends approving Cascade’s proposed revisions to its low-income bill assistance program in response to ongoing need for emergency assistance. Additionally, the Company should focus outreach efforts on customers with long-term arrearages.

I. EXTENDING CRISIS BILL ASSISTANCE

The Company seeks to increase the funds available for the Big HEART program for customers facing pandemic-related hardship. Program funds were initially limited to 1.0 percent of Washington retail revenues, but those funds are nearly exhausted. At the same time, significant past due balances remain for Cascade’s residential customers. According to the Company’s compliance filing in Docket U-200281 on October 15, 2021, residential arrearages totaled more than \$1.9 million as of the end of September 2021.¹ Taking this data into consideration, it is clear that significant need still exists and that current program funding will be inadequate to meet this need. In order to address ongoing customer needs, Public Counsel supports increasing funding

¹ 200281-CNGC-COVID-19 Term Sheet Data, *In re Response to the COVID-19 Pandemic*, Docket U-200281 (compliance filing on Oct. 15, 2021).

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and continuing the program to help reduce customer arrearages. This, in turn, will assist in keeping customers connected to their natural gas service, and this assistance is necessary because the disconnection moratorium expired on October 1, 2021.

Consistent with previous comments, Public Counsel remains concerned about the disproportionate share of long-term, past due balances. Of the total \$1.9 million residential arrearages, more than \$1.268 million of past due balances were 90 or more days old.² Approximately two-thirds of all arrearages are from accounts with past due balances of 90 or more days. Furthermore, the Energy Project's analysis presented in Docket U-200281 revealed that arrearages disproportionately impact vulnerable and highly-impacted communities.³ Those customers are at risk of disconnection as we head into the winter heating season. Given that 90 day past due balances remain high for Cascade, it is critical that concerted outreach efforts are maintained and expanded. Public Counsel continues to believe that threats of disconnection are not a substitute for direct, focused customer outreach.

Public Counsel appreciates the Company's willingness to work with stakeholders and continued efforts to support customers during the ongoing economic crisis. Please direct questions to Corey Dahl, at (206) 464-6380 or Corey.Dahl@ATG.WA.GOV.

Sincerely,

/s/ *Lisa W. Gafken*

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² *Id.*

³ Supplemental Comments of the Energy Project, Attachment A – IOU Zip Code Summaries, *In re: Response to the COVID-19 Pandemic*, Docket U-200281 (filed May 7, 2021).