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COMMISSION

September 19, 2022

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

RE: Cascade Natural Gas Corporation 2023 Integrated Resource Plan Amendment

Dear Mr. Johnson:

Enclosed for filing is an amendment to Cascade Natural Gas Corporation's Work Plan for its 2023 Integrated Resource Plan (IRP or Plan). Due to the unexpected length of time to run stochastic analysis in the Company's new upstream optimization model, Plexos, Cascade is requesting TAG 5 be moved from September 28, 2022, to October 20, 2022. This extension will allow Cascade to finalize and vet the final stochastic analysis results prior to presenting at TAG 5. Cascade does not anticipate this will impact the remainder of Cascade's schedule.

If there are any questions regarding this matter, please contact me at (509) 734-4546 or Mark Sellers-Vaughn at (509) 734-4589. Alternatively, we may be reached at [brian.robertson@cngc.com](mailto:brian.robertson@cngc.com), [mark.sellers-vaughn@cngc.com](mailto:mark.sellers-vaughn@cngc.com), or at [IRP@cngc.com](mailto:IRP@cngc.com).

Sincerely,  
CASCADE NATURAL GAS CORPORATION

A handwritten signature in black ink that reads "Brian Robertson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brian Robertson  
Supervisor, Resource Planning

Enclosures

### **Purpose of the Integrated Resource Plan**

The primary purpose of Cascade's long-term resource planning process has been, and continues to be, to inform and guide the Company's resource acquisition processes, consistent with the rule (WAC 480-90-238). Input and feedback from the Company's Technical Advisory Group (TAG) will continue to be an important resource to help ensure Cascade's IRP is developed from a broader perspective than Cascade could have on its own.

### **Outline of IRP Content:**

The following is an outline of the Company's 2023 IRP plan. Organizational structure of the final IRP may be revised based on results of analysis and feedback received through the planning process.

- I. Executive Summary
- II. Company Overview
- III. Demand Forecast
- IV. Supply Side Resources
- V. Avoided Costs
- VI. Environmental Policy
- VII. Demand Side Management
- VIII. Renewable Natural Gas
- IX. Distribution System Planning
- X. Resource Integration
- XI. Stakeholder Engagement
- XII. Two-year Action Plan
- XIII. Glossary and Maps
- XIV. Appendices

### **2023 IRP Timeline**

The 2023 IRP TAG meetings will likely take place via teleconference due to COVID, however, discussions throughout the IRP process may lead to in person TAG meetings. The following is Cascade's tentative 2023 IRP timeline:

- Develop Demand Forecast: January 2022 through May 2022
- Distribution System Planning Analysis: March through June 2022
- Gas Supply Analysis: April through July 2022
- Integration of Supply and Energy Efficiency Resources: April through August 2022
- Public Process: Technical Advisory Group Meetings
  - TAG 1: Process, Key Points, IRP Team, Timeline, Regional Market Outlook, Planned Scenarios and Sensitivities, Stakeholder Engagement, plan for dealing with issues raised in the 2020 IRP. (March 2022)
  - TAG 2: Demand and Customer Forecast and Non-Core Outlook, Drilling down into segments of demand forecast. Upstream Pipeline presentation. (May 2022)
  - TAG 3: Distribution System Planning, Alternative Resources, Price Forecast, Avoided Costs, Current Supply Resources, Transport Issues. (June 2022)
  - TAG 4: Carbon Impacts, Energy Efficiency, Bio-Natural Gas, Preliminary Resource Integration Results. (August 2022)
  - TAG 5: Final Integration Results, finalization of plan components, Proposed new 2- to 4-year Action Plan. (~~September~~ October 2022)
- File Draft 2023 IRP: (November 2022)
- Comments due on draft (January 2023)
- TAG 6 (if needed) (February 2023)
- Final 2023 IRP Filed: on or before February 26, 2023
- Open Meeting Presentation to Commissioners: TBD

## Planning Assumptions

Information needed to perform analysis will be gathered and input assumptions developed throughout the first eight months of 2022. This will include detailed definitions of alternative scenarios and all primary input assumptions for demand forecasting and resource modeling. Additional planning information will be assimilated into the analytical process and planning information that is not incorporated into the modeling process will continue to be assessed.

## 2023 IRP improvements

In the 2020 IRP Staff Comments, the WUTC Commission noted several observations where they would like to see improvements in the 2023 IRP.

- Impact of Legislation Enacted in 2021
- Impacts of COVID-19 Pandemic
- Peak Day Standard
- Impacts of Climate Change
- Upstream Greenhouse Gas Emission Accounting
- Avoided Cost Formula
- Impacts of Electrification and Natural Gas “Bans”
- Renewable Natural Gas Modeling and Evaluation Tool
- Validation of Methods
- Encouraging Participation in the IRP Process by Additional Stakeholders
- Additional Staff Comments Regarding the IRP Narrative

The Company looks forward to working through these improvements with Commission Staff throughout the 2023 IRP.

Process Items	Process Elements	Date
TAG 1 (Combined)	Process, Key Points, IRP Team, Timeline, Regional Market Outlook, Planned Scenarios and Sensitivities, Plan for dealing with issues raised in the 2020 IRP	3/30/2022
TAG 2 (Combined)	Demand and Customer Forecast and Non-Core Outlook, Drilling down into segments of demand forecast. Upstream Pipeline presentation.	5/18/2022
TAG 3 (WA)	Distribution System Planning, Alternative Resources, Price Forecast, Avoided Costs, Current Supply Resources, Transport Issues.	6/29/2022
TAG 4 (WA)	Carbon Impacts, Energy Efficiency, Bio-Natural Gas, Preliminary Resource Integration Results.	8/10/2022
TAG 5 (WA)	Final Integration Results, finalization of plan components, Proposed new 2- to 4-year Action Plan.	10/20/2022
Draft of 2022 IRP distributed (WA)	Filing of Draft IRP	11/24/2022
Comments due on draft from all stakeholders (WA)	Comments due from Stakeholders	1/13/2023
TAG 6, if needed (WA)	An additional TAG if needed based on comments from Stakeholders	2/1/2023
IRP filing (WA)	IRP Final Filing	2/24/2023