

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS
CORPORATION,

Respondent.

DOCKET UG-240008

EXHIBIT SNS-2

Affordability and Equity Metrics

September 25, 2024

The following tables provide The Energy Project’s recommendations for Cascade Natural Gas’s Performance-Based Ratemaking metrics in two categories: Affordability and Equity. The table is based on the Commission’s current Policy Statement metrics. Modifications to the Policy Statement metrics are shown with strikethrough or underline.

Customer Affordability

Metric	Notes
Annual revenue from base rates approved in most recent MYRP by customer class; total incremental or decremental revenue from all approved rate adjustments, excluding those authorized by the MYRP, occurring during the reporting year separated by schedule and customer class providing the calendar month and percentage of the change for each schedule; and net bill revenue (annual) by schedule.	Approve Commission metric
Number and percentage of (1) disconnect notices, (2) residential disconnections for non-payment, and (3) reconnection, each broken out by month and census tract, and comparing outcomes among all customers, estimated low-income households, known low-income households, highly impacted communities, and vulnerable populations.	Add metric
Number of customers in arrears by period and , total amount of arrearages, and average age of arrears, by month, by class, measured by census tract to include 30+, 60+, and 90+ days in arrears for total company, and electric and natural gas separately for dual fuel utilities. For residential, by census tract and comparing outcomes among all customers, low-income households, highly impacted communities, and vulnerable populations.	Edit and approve Commission metric
By census tract and quarterly, the number of residential customers in arrears with arrearage management plans divided by total customers in arrears.	Approve Commission metric
Washington-allocated net plant in service per customer.	Add metric
Washington-allocated annual O&M per customer.	Add metric
Rate of annual revenue growth compared to inflation	Add metric
Average annual <u>customer bill impacts, by class, and</u> by census tract.	Edit and approve Cascade metric
Average annual <u>customer bill impacts, by class, and</u> by zip code.	Edit and approve Cascade metric
Annual residential bill divided by area median income by census tract for all customers, <u>calculated before and after energy assistance, comparing outcomes in Named and Non-named Communities known low-income, Vulnerable Populations, and Highly Impacted Communities. For dual fuel utilities, electric and natural gas service should be stated separately calculated both before and after energy assistance.</u>	Edit and approve Commission metric

<p>The number and percentage of estimated low-income customers <u>receiving bill assistance who participate in one or more customer-funded energy assistance programs that actively lowers energy burden, both aggregated and by census tract, for all customers and comparing outcomes Vulnerable Populations, and Highly Impacted Communities;</u> and separately the number and percentage of estimated low-income population enrolled in a utility bill discount program and total amount of discount applied annually.</p>	<p>Edit and approve Commission metric</p>
<p>Number and percentage of customers-households experiencing high-energy burden (>6%), <u>separately identifying known low income and highly impacted communities and vulnerable populations,</u> by census tract.</p>	<p>Edit and approve Commission metric</p>

Advancing Equity in Utility Operations

Metric	Notes
<p>Separately calculated percentage of utility spending on demand response and distributed energy resources (energy efficiency, electric transportation, and renewables) that benefits <u>Named Communities as compared to Non-named Communities known low-income, Vulnerable Populations, and Highly Impacted Communities.</u></p>	<p>Edit and approve Commission metric</p>
<p>Number <u>and percentage</u> of customers in Named Communities or low-income customers enrolled in each utility DER program (providing a separate calculation for that participate in energy efficiency, electric transportation, net metering, and demand response) programs, <u>divided by total customers enrolled in each program. for all customers and comparing outcomes in low-income communities, Vulnerable Populations, and Highly Impacted Communities.</u></p>	<p>Edit and approve Commission metric</p>
<p>Percentage of suppliers that self-identify as owned by people of color, women, veteran, and other marginalized groups, and total dollar amount and percentage of total company spend to those suppliers.</p>	<p>Approve Commission metric</p>
<p>Percentage of employees and senior management (separately identifying: (a) C-suite employees, (b) directors and employees more senior than directors, and (c) the remaining workforce who identify as: (i) a person of color; and/or (ii) a woman or non-binary; Percentage of total employees that opt out from providing information either through HR data or surveys.</p>	<p>Approve Commission metric</p>
<p>Percentage of non-pipe alternative utility spending that occurs in highly impacted communities and on vulnerable populations.</p>	<p>Add metric</p>