

UG-231023

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February 22, 2024

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

RE: UG- 231023, Cascade Natural Gas Corporation 2025 Integrated Resource Plan

Dear Director Killip:

Enclosed for filing is an Amendment to Cascade Natural Gas Corporation's Work Plan for its 2025 Integrated Resource Plan (IRP or Plan). Cascade has four meetings that need to be re-established. The Distribution System Modeling and Customer/Load Forecast Targeted TAGs will be flipped to ensure the Company has enough time to make changes to the forecast model prior to the full TAG 1 meeting. The April 25 Targeted TAG will be moved to May 7, and the May 31 meeting will be moved to May 30. Cascade also determined that one hour was not enough time for the Targeted TAGs and will extend the meetings to two hours. Cascade does not anticipate this will affect the remainder of the IRP timeline and anticipates filing the final IRP by the filing deadline of February 24, 2025.

If there are any questions regarding this matter, please contact me at (509) 221-9808 or Mark Sellers-Vaughn at (509) 734-4589. Alternatively, we may be reached at brian.robertson@cngc.com, mark.sellers-vaughn@cngc.com, or at 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 2025 IRP plan. The 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. Distribution System Planning
- IX. Resource Integration
- X. Stakeholder Engagement
- XI. Two-year Action Plan
- XII. Glossary and Maps
- XIII. Appendices

2025 IRP Timeline

The 2025 IRP Timeline will include eight Public Targeted-TAG meetings and three regular Public TAG meetings. The following is Cascade’s tentative 2023 IRP timeline:

- Public Targeted-TAG process:
 - What is an IRP and how to get involved (Jan 2024)
 - Avoided Cost (Feb 2024)
 - Energy Efficiency (Mar 2024)
 - Equity in the IRP (Mar 2024)
 - Customer/Load Forecast (Apr 2024)
 - CCA/Compliance Modeling (Apr 2024)
 - Distribution System Planning (May 2024)
 - Resource Integration (May 2024)
- Public Process: Technical Advisory Group Meetings
 - TAG 1: Process, Key Points, IRP Team, Timeline, Regional Market Outlook, Planned Scenarios and Sensitivities, Stakeholder Engagement, Demand and Customer Forecast and Non-Core Outlook, Drilling down into segments of demand forecast. Upstream Pipeline presentation. (June 2024)
 - TAG 2: Respond to TAG 1 Feedback, Distribution System Planning, Alternative Resources, Price Forecast, Avoided Costs, Current Supply Resources, Transport Issues, Carbon Impacts, Energy Efficiency, Bio-Natural Gas, Preliminary Resource Integration Results. (July 2024)
- File First Draft 2025 IRP: (September 2024)
 - TAG 3: Respond to TAG 2 feedback, Final Integration Results, finalization of plan components, Proposed new 2- to 4-year Action Plan. (October 2024)
- File Second Draft 2025 IRP: (December 2024)
- Comments due on draft (January 2025)
- TAG 4 (if needed) (January 2025)

- Final 2025 IRP Filed: on or before February 24, 2025
- 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 2024. 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.

2025 IRP Improvements

In the 2023 IRP Staff Comments, the WUTC Commission noted several observations where they would like to see improvements in the 2025 IRP, specifically regarding the categories below:

- Renewable Natural Gas
- Demand Forecast
- Climate Commitment Act
- Conservation
- Price Forecasting
- Climate Change modeling
- Upstream and Distribution Emissions
- PLEXOS
- GTN Xpress
- Public Outreach and Engagement
- Other Comments

Recently, Cascade has developed an Equity Advisory Group (EAG). Cascade seeks to establish a clear understanding of the goals, outcomes, and objectives of the EAG. The process will begin with understanding the goals and objectives of the members in addition to building a working relationship. Initial areas of focus for the EAG will be in providing feedback in the development of Cascade's Multi-Year Rate Plan and Integrated Resource Plan. The IRP team will collaboratively work with the EAG to develop and maintain relationships. In order to gain interest in the IRP and increase participation, Cascade is going to include a social media post as well as provide information through bill inserts. The bill inserts will be in both English and Spanish and include information on how to join. To see the bill insert, please see Attachment A. Cascade is also considering holding meetings throughout Cascade's service territory during the first circulation of the Company's Draft IRP. Cascade is also considering other means of increasing participation if bill inserts and traveling to the service territories are unsuccessful. The Company looks forward to working through the above listed improvements with Commission Staff throughout the 2025 IRP.

Process Item	Date	Process Element
Targeted-TAG	Thursday, January 25, 2024	What is an IRP and how to get involved
Targeted-TAG	Thursday, February 15, 2024	Avoided Cost
Targeted-TAG	Wednesday, March 6, 2024	Energy Efficiency
Targeted-TAG	Thursday, March 28, 2024	Equity in the IRP
Targeted-TAG	Thursday, April 11, 2024	Customer/Load Forecast
Targeted-TAG	Tuesday, May 7, 2024	CCA/Compliance Modeling
Targeted-TAG	Thursday, May 16, 2024	Distribution System Planning
Targeted-TAG	Thursday, May 30, 2024	Resource Integration
TAG 1	Thursday, June 13, 2024	Process, Key Points, IRP Team, Timeline, Regional Market Outlook, Planned Scenarios and Sensitivities, Stakeholder Engagement, Demand and Customer Forecast and Non-Core Outlook, Drilling down into segments of demand forecast. Upstream Pipeline presentation.
Receive feedback on TAG 1	Friday, June 28, 2024	
TAG 2	Thursday, July 25, 2024	Respond to TAG 1 Feedback, Distribution System Planning, Alternative Resources, Price Forecast, Avoided Costs, Current Supply Resources, Transport Issues, Carbon Impacts, Energy Efficiency, Bio-Natural Gas, Preliminary Resource Integration Results.
Receive feedback on TAG 2	Friday, August 9, 2024	
First Draft	Friday, September 6, 2024	
Comments Due	Friday, October 4, 2024	
TAG 3	Wednesday, October 30, 2024	Respond to TAG 2 feedback, Final Integration Results, finalization of plan components, Proposed new 2- to 4-year Action Plan
Final Draft	Tuesday, December 3, 2024	
Comments Due	Tuesday, January 14, 2025	
TAG 4 (if needed)	Thursday, January 30, 2025	
Final Complete By	Friday, February 14, 2025	
File	Monday, February 24, 2025	