

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS
CORPORATION,

Respondent.

DOCKET UG-240008

EXHIBIT SNS-6

Cascade Responses to TEP Data Requests
Concerning Language Access

September 25, 2024

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UG-240008
Cascade Natural Gas Corporation
2024 General Rate Case**

The Energy Project DATA REQUEST NO. 08:

Re: Equity

Does Cascade’s customer relationship management system track a customer’s language preference? If so, please describe:

- A. How Cascade determines what language an individual customer prefers to use when contacting the Company.
- B. What languages a customer may select as their preferred language.
- C. What percentage of customers selected each language.

Response:

Yes, Cascade Natural Gas Corporation (“Cascade”) tracks customer language preferences in its Customer Information System (“CIS”).

- A. Cascade learns of an individual customer’s preferred language by asking the customer and then storing their answer in the Company’s CIS. The functionality to select a preferred language and store it in the Company’s CIS was implemented in August 2022. Starting in April 2023, Cascade implemented the process whereby a customer service agent asks a customer who calls to start service what their preferred language is for communications. Agents then update the language preference on the customer’s account in the company’s CIS. Attached as Attachment A “240008-CNGC-Resp-TEP DR-10-Attach A.pdf.” to Cascade’s Response to TEP Data Request No. 10, please find the internal policy guiding agents in this process.

Cascade also learns of its customers’ language preference through its discussions with its Equity Advisory Group (EAG) and its Cascade Arrearage Relief and Energy Savings (CARES) Advisory Group. As discussed on pages 17-18 of the Direct Testimony of Daniel L. Tillis, Exh. DLT-1T, Cascade has translated its program materials into additional languages, expanded its website translation services, and improved the readability of its Spanish communications based on conversations with its EAG and CARES Advisory Group.

- B. The language options available to customers vary by communication channel as discussed below:

A customer calling to establish service may state that they prefer to communicate in any language they choose. The Company's CIS field for preferred languages is a dropdown list containing the most commonly spoken languages in the Company's Oregon and Washington service territory other than English. That list contains the following languages: French, Hmong, Indonesian, Japanese, Korean, Romanian, Russian, Somali, Spanish, Swahili, Ukrainian, and Vietnamese. If a customer chooses a language other than one in the CIS dropdown list, the comment field may be noted. The CIS dropdown list can be updated as preferred languages change.

When a customer calls Cascade's customer call center, a customer may indicate that they would like to communicate with the Company in over 240 languages and Cascade will engage its interpretative services in order to speak to the customer in their preferred language. (See page 17 of Daniel L. Tillis's Direct Testimony, Exh. DLT-1T.)

A customer seeking to apply for Cascade's CARES program can find the CARES application on the Company's website in the following languages: English, Spanish, Arabic, Burmese, Chinese, Dari, Filipino, Rohingya, Russian, Tagalog, Ukrainian, and Vietnamese.

A customer wanting to read PDFs posted to Cascade's website regarding safety and education, rates and tariffs, and energy assistance, may access English or Spanish versions on the website or may request that the Company provide these resources to them in following languages: Arabic, Burmese, Chinese, Dari, Filipino, Rohingya, Russian, Tagalog, Ukrainian, and Vietnamese.

Starting March 2024, customer bill inserts are mailed to customers in both English and Spanish. Both English and Spanish versions are also downloadable from the Company's website.

A customer seeking to read Cascade's webpage may use the translation services available in the lower lefthand box to immediately convert the content to the following languages: Spanish, Chinese, Hmong, Indonesian, Japanese, Korean, Vietnamese, Romanian, Russian, Somali, Swahili, Ukrainian, and French.

For more information on how Cascade has adapted its communications to reach more linguistically isolated customers, see the Direct Testimony of Daniel L. Tillis, Exh. DLT-1T, and the Direct Testimony of Noemi Ortiz, Exh. NO-1T.

C. Since August 2022, 1,230 Washington customers have shared with Cascade their preferred language other than English. Below is the percentage breakdown for each language other than English:

Spanish - 91.62%
Ukrainian - 2.4%
Vietnamese - 1.9%
Chinese - 1.9%
Korean - 0.81%
Russian - 0.73%
Indonesian - 0.24%
Japanese 0.24%
French - .08%
Swahili - .08%
Somali - 0%
Romanian - 0%

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UG-240008
Cascade Natural Gas Corporation
2024 General Rate Case**

The Energy Project DATA REQUEST NO. 09:

Re: Equity

Does Cascade collect information about languages commonly spoken in its service territory? If the answer is yes, please:

A. Describe the sources and methods Cascade uses to understand the languages spoken by its customers or in its service territory.

B. Provide the information or data that Cascade collects on languages spoken by its customers or in its service territory, including any estimates of the number or percent of customers or residents of the Company's Washington service area that speak each identified language.

Response:

A. Yes. As provided in its response to The Energy Project ("TEP") Data Request No. 08, Cascade Natural Gas Corporation's ("Cascade") customer service representatives ask customers their preferred language when they call to establish service. This information is saved in the Company's Customer Information System.

Cascade also uses census tract data to identify areas in its service territory where residents speak limited English. Cascade also uses Washington State Office of Superintendent of Public Instruction ("OSPI") to track languages spoken in its Washington service territory. OSPI data is updated annually.

Also, as discussed in the Direct Testimony of Daniel L. Tillis (page 17, Exh. DLT-1T) and the Direct Testimony of Noemi Ortiz (pages 18-19, Exh NO-1T), Cascade discusses its customer's preferred languages with its Cascade Arrearage Relief and Energy Savings (CARES) Advisory Group and its Equity Advisory Group ("EAG"). To date, conversations with the Company's EAG have resulted in Cascade updating its website language translation application for improved readability in thirteen languages. Discussions with Cascade's CARES Advisory Group have resulted in all bill payment assistance program materials being translated into both English and Spanish, and the program flyers and paper applications into Tagalog, Burmese, Filipino, Punjabi, Chinese, Vietnamese, Ukrainian, Arabic, and Russian.

- B. Attached as Attachment A, “240008-CNGC-Resp-TEP DR-09-Attach A.xlsx”, please find OSPI data on languages spoken in Washington by percentage of residents within a school district. The highlighted school districts are in Cascade’s service territory.

The summary of EAG feedback is provided in Exh. NO-13.

Also, Cascade’s Response to TEP Data Request No. 08(C) provides the percentages of preferred languages other than English as reported by Washington customers.

ATTACHMENT A to Cascade's Response to THE ENERGY PROJECT Data Request No. 09

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UG-240008
Cascade Natural Gas Corporation
2024 General Rate Case**

The Energy Project DATA REQUEST NO. 11:

Re: Equity

Please list any policies and procedures, including state statutes, state regulations and internal policies, that Cascade follows when deciding whether to disconnect a customer.

Response:

Cascade Natural Gas Corporation (“Cascade”) credit & collection practices comply with the following:

- WAC 480-90-128, Disconnection of Service¹
- Cascade’s Tariff, WN U-3, Rule 5, Disconnection and Reconnection of Service²

Additionally, account risk factors discussed in Cascade’s responses to The Energy Project Data Request Nos. 01-07 determine which accounts are most at risk for write-off and thereby eligible for disconnection. Cascade Credit Representatives conduct a thorough review of every account eligible for disconnection for an opportunity to postpone disconnection, such as notification of pending energy assistance applications or pledges and potential for energy assistance program qualification. Credit Representatives attempt manual contact with the customer to discuss energy assistance programs, refer customers to other energy assistance organizations and to provide options for payment plans or long-term payment arrangements. Cascade Service Mechanics provide printed energy assistance and bill payment option information on premise when they are able to speak with a customer prior to non-pay disconnection. In addition to accounts not considered for disconnection according to rule, customers who agree to reasonable payment terms, or who are able to reduce their account balance through energy assistance grants,² are not considered for non-pay disconnection.

¹ See <https://app.leg.wa.gov/WAC/default.aspx?cite=480-90&full=true#480-90-128>

² See <https://www.cngc.com/wp-content/uploads/PDFs/Rates-Tariffs/Washington/2022/Rule-5.pdf>