

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS
CORPORATION,

Respondent.

DOCKET UG-240008

EXHIBIT SNS-7

Cascade Responses to TEP Data Requests
Concerning Credit and Collections

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. 01:

Re: Credit and Collections

A. In docket U-210800 Cascade explains that it uses credit categories of “low,” “medium” and “high” risk for each customer. Please list all types of customer information that is used to develop the customer’s risk categorization (e.g., payment history, prior disconnections). Please provide a detailed narrative explaining Cascade’s process for this categorization. Please include all relevant criteria, factors, thresholds, timelines, or data used in this categorization.

B. Please list all sources of information used to determine the categorization identified in part A of this request, including any third-party data.

C. Please provide an example of how an individual customer categorization is determined, using a hypothetical customer, for each of the categories identified in part A of this request, i.e., “low,” “medium” and “high.”

D. How does Cascade use the categorization identified in part A of this request? Include a description of all the ways that Cascade treats customers differently based on this categorization.

E. For each factor identified in part A, please provide the weight given to each factor.

F. Does the response to parts A through D differ from that provided as Cascade’s Response to TEP DR 002 in Dockets UG-210755? If so, how does it differ?

Response:

A. Cascade Natural Gas Corporation (“Cascade”) uses a weighted calculation of days past due, days since last payment, last payment amount, and the number of days in service to calculate an initial account behavior score. As debt ages on an account (30 days past due, 60 days past due, 90 days, etc.), the score is multiplied by a factor assigned to that age category to increase the score as the debt ages. Likewise, days since last payment is multiplied by a payment days factor, and so on. Days in service also carries a weighted factor in the calculation because most of Cascade’s write-off debt is held by customers in service for less than two years.

Cascade’s Response to TEP Data Request No. 01
Date of Response: July 31, 2024
Person who Prepared the Response: Teri Sovak
Witness Knowledgeable About the Response: Daniel L. Tillis

Each collection path (low, medium, high) is assigned a set range of behavior scores in the system.

Once an initial behavior score is obtained, the programming goes on to check for other account criteria that may adjust the score up or down before entering a collection path. (See Cascade’s Response to TEP Data Request No. 01 (B), below.)

All of this account review happens prior to an account entering a collection path and is designed to override base functionality that previously sent disconnect notices to all Cascade customers meeting the debt criteria for the residential customer class. Residential accounts that are not on Budget Billing have debt criteria of \$50.00 and 35 days old before being eligible for collections.

B. Cascade does not use any third-party sources to determine the collection path. All information is obtained through the customer’s account history with Cascade.

- Amount of arrears
- Age of debt
- Days since last payment
- Last Payment Amount
- Days in service
- Active Auto Pay
- Other financially responsible account holders with stopped service where debt is owing
- Other Service Agreements on Account Past Due (AVG Risk)
- Not sufficient funds (NSF) payments in payment history
- A paid deposit held on the Account
- No home or cellular phone number

C. The following are three examples of how individual customer categorization is determined:

Example 1

Account is 36 days past due with 4,050 days in service owing \$50.00. Last payment was \$129.48, paid 32 days prior.

- No other accounts with debt owing
- No NSF payments in history
- No held deposits
- Valid phone number on file

Account calculates to follow the Low-Risk collections path based on age of debt, account balance and time since last payment.

Example 2

Account is 36 days past due with 4,050 days in service owing \$50.00. Last payment was \$129.48, paid 32 days prior.

- No other accounts with debt owing
- No NSF payments in history
- No held deposits
- No valid phone number on file

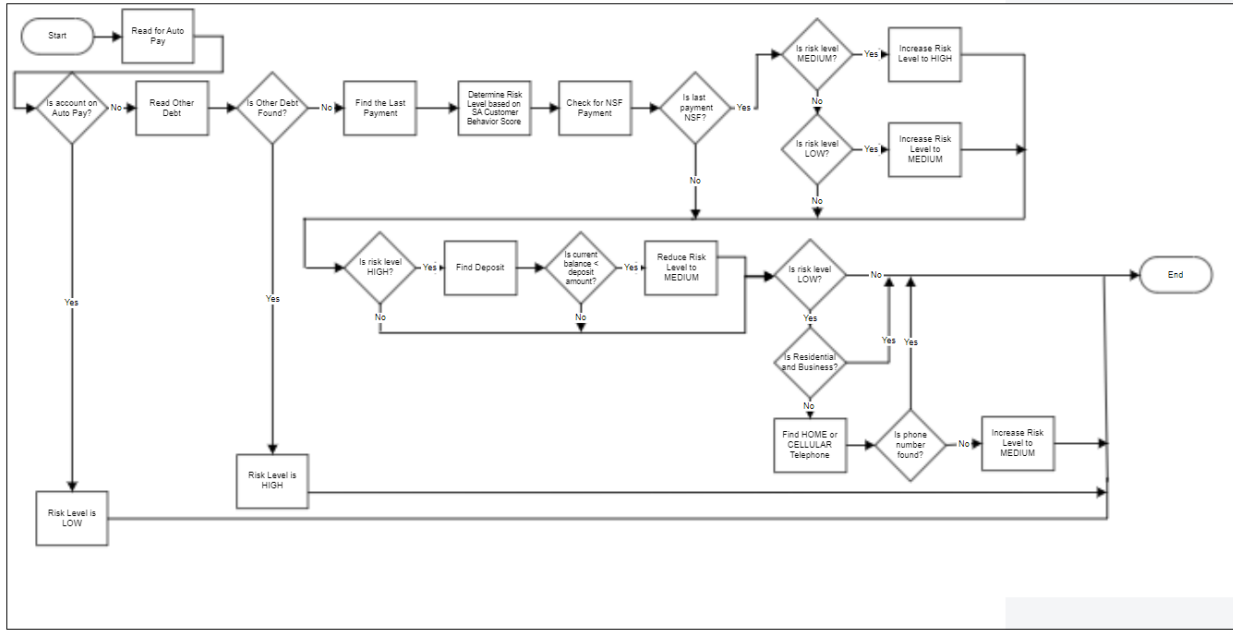
Account initially calculates to follow the low-risk collections path, but because there is no valid phone number on file (and the only event in the low-risk collection path is an automated phone call), the account advances to the medium path to receive the friendly reminder letter.

Example 3

Account has debt that is 90+ days past due with 20,612 days in service owing \$419.91. Last payment was \$140.00, paid 389 days prior.

- No other accounts with debt owing
- No NSF payments in history
- No held deposits
- Valid phone number on file

Account calculates to follow the High-Risk collections path based on age of debt, account balance and the number of days since last payment.



D. This calculation is called by the system as part of the collections processing. Accounts are recalculated each time they meet the \$50/35 day debt criteria. The score is not stored within the system and the customer is not flagged as low, medium, or high. It is not used for any other purpose than to determine what collection path an account takes each time the account is reviewed after becoming past due. Based on the condition of the account, the results may vary the next time the account meets the debt criteria.

E. Below are the weights for each factor:

- #SixtyDaysFactor = 4
- #NinetyDaysFactor = 8
- #ServiceDaysFactor = 0.5
- #PastDueFactor = .2
- #PaymentDaysFactor = 1.4

F. Cascade provides the following updates to its Response to TEP DR 002 issued in UG-210755:

- In part B, Active Auto-Pay was added to the bulleted list.
- In part C, the process flow diagram has been updated to include checks for Auto-Pay and commercial service.

Cascade’s Response to TEP Data Request No. 01
 Date of Response: July 31, 2024
 Person who Prepared the Response: Teri Sovak
 Witness Knowledgeable About the Response: Daniel L. Tillis

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

The Energy Project DATA REQUEST NO. 03:

Re: Credit and Collections

Does Cascade use credit scores, credit ratings, or creditworthiness analysis of any kind in connection with disconnection? If yes, please describe in detail.

Response:

No. Cascade Natural Gas Corporation uses only its utility account information to determine eligibility for disconnection.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

The Energy Project DATA REQUEST NO. 05:

Re: Credit and Collections

A. Cascade’s comments in docket U-210800 explain that customers with the “low” or “medium” risk classifications follow a collections path with “no threat of disconnection;” in contrast, customers in the “high” risk classification are eligible for disconnection on day 14.¹ Please provide a narrative explanation, list of criteria, factors, and thresholds, as well as a timelines that describe how a customer with a “low” or “medium” risk classification could become eligible for disconnection. If a customer can change classifications, for example from “low” to “high,” and become eligible for disconnection, please include a timeline that covers the entire process from a low risk customer’s bill due date to disconnection.

B. Please indicate if this response differs from that provided as Cascade’s Response to TEP DR 007 in Dockets UG-210755, and if so, how Cascade’s practice has changed.

Response:

A. Cascade utilizes behavior scoring for an account to systematically follow one of three risk paths. Because a customer account is evaluated every month and a new behavior score is calculated based on the unique circumstances of the account at that point in time, timelines are unique to each account.

An account is evaluated for collections eligibility after each billing cycle, once the bill due date and grace days have passed (\$50/35 days old). Cascade’s bill due date is 22 days after the account bills, with 14 grace days; meaning the account is reviewed for collections on day 36, which is typically after the customer receives an additional bill showing past due debt.

Because Cascade uses account factors such as the amount of arrears, number of days past due, days since last payment, last payment amount, the number of days in service, as well as other account information to calculate a new behavior score each time the account enters into collections, it is possible for an account to follow the low-risk path several months in a row or advance from low to medium or high-risk path the next month if no payment is made (i.e. the account still meets the \$50/35 days old debt criteria), and the debt ages and grows. A calculated behavior score is not stored in Cascade’s system or used for any other purpose

¹ Docket U-210800, Cascade Natural Gas Comments Regarding Potential Long-Term Changes and Improvements to Customer Notice, Credit, and Collection Rules, at p. 10-11 (April 29, 2022).

other than a one-time use to determine which collection path an account takes at a specific point in time.

Having multiple variables in the calculation, along with additional check points that can adjust the collections path, can result in a variety of scenarios. See examples provided below.

Account 1 – Low, Med, High progression over 3 months of billing

Month 1

Last Pay Date	Last Pay Amt	30-60 Past Due	61-90 Past Due	91+ Past Due	Days Since Last Pay	Days in Service	Coll Path	Notes
3/20/22	25.00	75.00	0	0	12	1916	Low	In service for 5 years +. Recent payment on Account, age and balance of debt low. Automated call only.

If no payment made to the above example and the Account cycles through billing again the next month:

Month 2

Last Pay Date	Last Pay Amt	30-60 Past Due	61-90 Past Due	91+ Past Due	Days Since Last Pay	Days in Service	Coll Path	Notes
3/20/22	25.00	75.00	75.00	0	43	1947	Med	Coll path advances with aging debt and account balance. Friendly reminder letter sent.

If no payment made after friendly reminder is sent and the Account cycles through billing again the next month:

Month 3

Last Pay Date	Last Pay Amt	30-60 Past Due	61-90 Past Due	91+ Past Due	Days Since Last Pay	Days in Service	Coll Path	Notes
3/20/22	25.00	75.00	75.00	75.00	74	1978	High	Coll path advances with aging debt and account balance. Automated call and disconnect notices sent. Severance process starts.

Cascade's Response to TEP Data Request No. 05
 Date of Response: July 31, 2024
 Person who Prepared the Response: Teri Sovak
 Witness Knowledgeable About the Response: Daniel L. Tillis

Account 2 – Automatic High path

Last Pay Date	Last Pay Amt	30-60 Past Due	61-90 Past Due	91+ Past Due	Days Since Last Pay	Days in Service	Coll Path	Notes
N/A	N/A	75.00	0	0	N/A	90	HIGH	In service only 90 days. No payment since start of service. Automatic High collection path.

Account 3 – Reduction in path

Last Pay Date	Last Pay Amt	30-60 Past Due	61-90 Past Due	91+ Past Due	Days Since Last Pay	Days in Service	Initial Behavior or Score	Paid Deposit	Coll Path	Notes
3/20/22	25.00	75.00	75.00	0	43	1947	Med	\$150.00	Low	Coll path reduced from medium to low due to the paid deposit that covered the past due. Account still meets the \$50/35 day debt criteria, so must start collections process, but only makes automated call.

Only accounts entering the High, or normal, collection path are eligible for disconnection. A Residential Account on the normal collection path will complete the following collection and severance timeline:

Billing Event	Days After Billing
Bill Due	22
Account Reviewed for Collection Eligibility	36

Collection/Severance Event	Day of Collection Process	Days After Billing
Automated Call	0	Approx. 36
Disconnection of Service Notice	3	Approx. 39
Urgent Notice	8	Approx. 44
Start Severance Process	11	Approx. 47-50
Manual Agent-Led Call	12	Approx. 48-51
Eligible for Disconnection	14	Approx. 52-54

Cascade's Response to TEP Data Request No. 05
 Date of Response: July 31, 2024
 Person who Prepared the Response: Teri Sovak
 Witness Knowledgeable About the Response: Daniel L. Tillis

- Other outbound contact points include:
- Manual agent-led calls any time a short-term pay plan is not kept by the customer.
- Manual agent-led calls any time a payment is returned for non-sufficient funds.
- Manual agent-led calls to customers who may qualify for certain energy assistance opportunities.
- At any point, a customer can contact Cascade with payment of their past due balance, schedule a payment arrangement, or discuss energy assistance options that would prevent disconnection.

B. No, this response does not differ from that provided as Cascade's Response to TEP DR 007 in Docket UG-210755.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

The Energy Project DATA REQUEST NO. 16:

Re: Credit and Collections

Reference: Cascade Response to TEP DR 05

A. Please provide the average percentage of customers with High, Medium, Low, and None risk classifications over the last 12 billing cycles.

B. Please provide a table similar to the one provided below that shows the average number of Cascade customers that are known low-income, estimated low-income, and located in highly impacted communities that Cascade has assigned each risk classification over the past 12 billing cycles. For example, the table will show what percentage of known low-income customers are sorted into High, Medium, Low, and None separately. Please include a column that indicates the percentage of customers that meet any of those criteria within each classification. Finally, please include a column that indicates the percentage of total customers in each classification.

Risk Classification	% Known Low Income	% Estimated Low Income	% Highly Impacted Communities	% Known Low Income, Estimated Low Income, or Highly Impacted Community	% All Customers
None					
Low					
Medium					
High					

Response:

- A. Cascade Natural Gas Corporation (“Cascade”) is not able to provide the data requested in TEP Data Request No. 16A because Cascade does not possess the average percentage of customers with High (a.k.a. Normal), Medium, Low and None risk classifications. Risk

Cascade’s Response to TEP Staff Data Request No. 16
Date of Response: August 19, 2024
Person who Prepared the Response: Daniel L. Tillis
Witness Knowledgeable About the Response: Daniel L. Tillis

classifications are programmatically determined behind the scenes in Cascade’s billing system when the criteria for a collection process is met; risk classification are temporary, based on information at the time of the one collection process, and they are not stored in the billing system. However, Cascade can provide percentages for each collection process.

For the time period August 2023 through July 2024, 97,651 collections processes were started on Cascade Washington Residential accounts. Taking the average count of processes started divided by the average number of Residential accounts for that time period, that represents 3.99%. This data is counting the number of processes started, not the number of customers. The same customer who has had more than one collection process will have had more than one risk path or the same risk path more than once during the course of each year. Therefore, this data overstates the number of customer accounts that enter the collection process. Of the 8,138 collections processes started, 55% followed the Low Risk Path, 10.2% followed the Medium Risk Path, and 34.8% followed the High (a.k.a. Normal) Risk Path.

Only accounts entering the High Risk Path are reviewed for an agent-led call and possible disconnect for non-payment. Not all accounts reviewed for possible disconnect are disconnected since customers make a payment, establish a Time Payment Arrangement, or receive bill pay assistance. See the table below for additional detail. The All Path data represents all collections processes started in the past 12 months. The All Path percentage is the average percent of processes started divided by the average number of premises. The percentage for the Low, Medium, and Normal paths represents the count of each path divided by the total All Path count.

Year	Month	Premise Count	Low Count	Low Path %	Medium Count	Medium Path %	Normal Count	High Path %	All Path Count	All Path %
2023	August	202,572	2,566	43.05%	798	13.39%	2,597	43.57%	5,961	2.94%
2023	September	202,806	1,438	37.44%	669	17.42%	1,734	45.14%	3,841	1.89%
2023	October	203,654	1,578	39.53%	686	17.18%	1,728	43.29%	3,992	1.96%
2023	November	204,205	1,349	37.47%	494	13.72%	1,757	48.81%	3,600	1.76%
2023	December	204,471	4,920	54.76%	859	9.56%	3,205	35.67%	8,984	4.39%
2024	January	204,736	7,123	59.28%	890	7.41%	4,003	33.31%	12,016	5.87%
2024	February	204,779	3,071	44.53%	738	10.70%	3,087	44.77%	6,896	3.37%
2024	March	204,831	6,418	59.70%	986	9.17%	3,346	31.13%	10,750	5.25%
2024	April	204,699	8,131	63.76%	955	7.49%	3,667	28.75%	12,753	6.23%
2024	May	204,504	7,045	62.80%	973	8.67%	3,201	28.53%	11,219	5.49%
2024	June	204,332	5,377	58.50%	943	10.26%	2,872	31.24%	9,192	4.50%
2024	July	204,217	4,651	55.06%	1,027	12.16%	2,769	32.78%	8,447	4.14%
	Average	204,151	4,472	54.96%	835	10.26%	2,831	34.78%	8,138	3.99%

- B. Cascade is not able to provide the data requested in TEP Data Request No. 16B because risk classifications are determined programmatically behind the scenes in Cascade’s billing system when the criteria for a collection process is met; risk classification are temporary, based on information at the time of the one collection process, and they are not stored in the billing system.

Cascade’s Response to TEP Staff Data Request No. 16
 Date of Response: August 19, 2024
 Person who Prepared the Response: Daniel L. Tillis
 Witness Knowledgeable About the Response: Daniel L. Tillis

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

The Energy Project DATA REQUEST NO. 19:

Re: Credit and Collections

Reference: Cascade Response to TEP DR 12

Please provide examples of all standard communications sent to a customer that is past due, including communications provided before and during the disconnection process. Please include copies of any scripts used for phone calls or in-person visits and copies of any letters or other written communications.

Response:

Listed below are the communications Cascade Natural Gas Corporation “Cascade” provides to customers before and during its process for disconnection for non-payment.

1. Reminder text sent two days after the bill due date for Cascade WA Residential accounts opted in to receiving text messages.

"Utility Alerts: Your CNG account balance is <acct bal>. Sign in to view payment options at cngc.com. Text HELP for help; STOP to cancel."

- If a customer texts HELP, they received a text stating, “More help at 877-311-6599,” which is Cascade’s global customer service phone number.

2. Reminder email sent two days after the bill due date for Cascade WA Residential accounts opted in to receiving emails.



CASCADe NATURAL GAS CORPORATION

Your Payment Has Not Yet Arrived

We'd like to remind you that your payment is due. Please disregard this reminder if you have already sent or scheduled your payment. You can view your account here: https://customer.cngc.com.

If you are having difficulty paying your bill in full, click here to learn more about energy assistance and pay plan options.

Table with 2 columns: Account Number, Pay this Amount (\$25.78), Payment Due Date (08/23/2023)



My Account



Payment Options



Energy Efficiency

CNGC HOME

FINANCIAL ASSISTANCE

ABOUT THIS MESSAGE:

This e-mail was sent to [redacted] as a courtesy reminder or confirmation of recent activity on your CNGC utility account.

If you have any questions about this e-mail or your account you may contact customer service via e-mail at CustomerService@cngc.com, or call (888) 522-1130.

Copyright © 2023 Cascade Natural Gas Corporation — All rights reserved.

The "click here" hyperlink opens a webpage about low-income bill assistance programs (https://www.cngc.com/customer-service/low-income_assistance_programs/?sfw=pass1724783020).

Cascade's Response to TEP Data Request No. 19
Date of Response: September 9, 2024
Person who Prepared the Response: Teri Sovak
Witness Knowledgeable About the Response: Daniel L. Tillis

3. **Bill Onsert appearing on the customer's monthly billing statement that states a past-due amount (subject to statement space availability).**

IN DANGER OF BEING DISCONNECTED?

Help is available.

There is a past-due balance on your account. Please call our Customer Service Department to discuss payment options.

Financial Assistance is available for those who qualify.



Scan this code with your mobile device to learn more about the assistance options in your area.

4. **Automated interactive voice response (IVR) outbound call script for accounts starting collections.**

Collection IVR

Hello. This is Cascade Natural Gas calling with an important message for (customer name).

If this is (customer name) please press 1, otherwise press 2.

(1 is pressed)

To ensure we have the correct customer, please enter the last 4 digits of your social security number followed by the pound sign.

(Pin number entered)

Your Cascade Natural Gas service at (premise address) is at risk because we have not received payment. The total amount due on your account is (amount past due). Satisfactory arrangements or a payment of at least (amount past due) must be made promptly. Payments can be made by visiting our website at c n g c dot com, or by contacting 888-522-1130 Monday through Friday 7:30 AM to 6:30 PM. We appreciate your attention to this matter. If a payment has already been submitted, no further action is required on your part. Thank you.

(2 is pressed)

This is Cascade Natural Gas calling regarding your service at (service address). Please return our call at 888-522-1130 Monday through Friday, 7:30 AM to 6:30 PM and remember to have your account number ready. You may also visit our website at c n g c dot com.

Answering Machine:

This is Cascade Natural Gas calling regarding your service at (service address). Please return our call at 888-522-1130 Monday through Friday, 7:30 AM to 6:30 PM and remember to have your account number ready. You may also visit our website at c n g c dot com.

5. Friendly Reminder letter for accounts starting the medium-risk collections path.

 <p>CASCADE NATURAL GAS CORPORATION® <small>A Subsidiary of MDU Resources Group, Inc.</small></p> <p><i>In the Community to Serve®</i></p>	SERVICE FOR	ACCOUNT NUMBER	PAGE 1 OF 1
	www.cngc.com	NOTICE DATE August 22, 2024	AMOUNT DUE \$124.66

▶▶▶ REMINDER ◀◀◀

Your account is past due.

Dear

We value your business. It is our desire to meet your energy needs today and well into the future. To continue to serve you best, please review your account balance. This is a friendly reminder that your payment was due on September 4, 2024.

We understand life gets hectic and other responsibilities may take priority. We are here to help. Please use one of the payment options listed to the right, and if needed, call us for assistance in paying your bill. Cascade Natural Gas Corporation offers many options for financial assistance.

Customer Service

1-888-522-1130
Mon-Fri
7:30 a.m - 6:30 p.m.

Enroll in Automatic Payment Plan and never miss a payment again. You can enroll once your account is current by logging in to your online account.

Emergency calls are accepted 24/7 by calling 1-888-522-1130.

Disregard this notice if payment has been made. Thank you.

Payment Options:

Online: Go to www.cngc.com and use our free Online Account Services to make payments 24/7.

Phone: To make a debit, credit card or check-by-phone payment, call 1-833-425-1694. A fee for each transaction will apply.

Payment Locations: Pay by cash, check or money order at one of our payment locations. Nearest locations can be found at www.cngc.com.

Please note, payments are not accepted at our local offices.

Mail: Cascade Natural Gas Corporation
PO Box 5600
Bismarck, ND 58506-5603

6. Disconnection of Service notice sent to accounts starting the Normal/High collections path.



SERVICE FOR

www.cngc.com

ACCOUNT NUMBER

NOTICE DATE
August 22, 2024

PAGE 1 of 1

MUST BE PAID BY

September 5, 2024

AMOUNT DUE

\$165.96

▶▶▶ Past Due Notice ◀◀◀

Dear Customer:

We have not received payment on your Past Due Account. To avoid discontinuance of service, payment must be received, or arrangements for payment made with us prior to 5 p.m. on September 5, 2024.

Payments may be made at local Convenience Pay® locations. Please contact Cascade Natural Gas Corporation at 1-888-522-1130 or visit www.cngc.com for payment locations. Please let us know if payment is made at a Convenience Pay® location.

To make a debit, credit card or check-by-phone payment, simply call our customer service number and follow the prompts to be connected with our independent service provider. A convenience fee for each transaction will apply. Please let us know if payment is made by credit card.

If service has been disconnected and payment is received after 12 p.m., service may not be restored until the following business day.

Payment on past due balances with a returned check may result in discontinuance of service without further notice.

If you are experiencing a financial hardship, contact us for individualized payment plan options. Cascade Natural Gas Corporation offers the following no-strings attached services directly, or is able to get you in contact with local Community Action Agencies for additional assistance to help get your account current (the following can be used in combination):

- Payment Plans (each designed to fit your budget)
- Low Income Home Energy Assistance Program (LIHEAP)
- Cascade Arrearage Relief and Energy Savings (CARES)
- Winter Help

If payment has been made, please contact us at 1-888-522-1130 before disregarding this notice. Thank you.

PLEASE KEEP THIS PORTION FOR YOUR RECORDS.

Questions?

1-888-522-1130

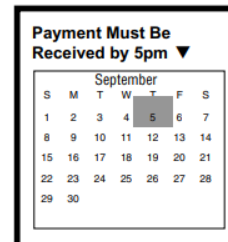
If you have any questions concerning your bill, payment locations, or payment arrangements, please contact Cascade Natural Gas Corporation between 7:30 a.m - 6:30 p.m., Monday - Friday. Billing information is not available after hours.

Payments are not accepted at the local office.

After hours emergency, call:

1-888-522-1130

Si necesita ayuda de traducción, llame Cascade Natural Gas Corporation



7. Urgent Notice sent to accounts in the Normal/High collections path.



SERVICE FOR [Redacted] www.cngc.com

PAGE 1 of 1
ACCOUNT NUMBER [Redacted] MUST BE PAID BY September 3, 2024
NOTICE DATE August 23, 2024 AMOUNT DUE \$383.92

Urgent Notice Regarding Discontinuance Of Gas Service

Our records indicate that we have not received payments for the amount of your past due gas bill for which a "Past Due Notice" was recently mailed to you.

Cascade Natural Gas Corporation must receive \$383.92

If payment is not received by 5:00 p.m., September 3, 2024, your service may be disconnected.

If you are unable to pay your bill in full at this time, contact Customer Service at 1-888-522-1130 between 7:30 a.m - 6:30 p.m., Monday through Friday and discuss debt relief programs or payment arrangements to avoid disconnection of your service.

You may make payments at any of our local Convenience Pay@ locations. Please contact Cascade Natural Gas Corporation at 1-888-522-1130 or visit www.cngc.com for payment locations. Please let us know if payment is made at a Convenience Pay@ location.

To make a debit, credit card or check-by-phone payment, simply call our customer service number and follow the prompts to be connected with our independent service provider. A convenience fee for each transaction will apply. Please let us know if payment is made by credit card.

If service has been disconnected and payment is received after 12 p.m., service may not be restored until the following business day.

If you are experiencing a financial hardship, contact us for individualized payment plan options. Cascade Natural Gas Corporation offers the following no-strings attached services directly, or is able to get you in contact with local Community Action Agencies for additional assistance to help get your account current (the following can be used in combination):

- Payment Plans (each designed to fit your budget)
- Low Income Home Energy Assistance Program (LIHEAP)
- Cascade Arrearage Relief and Energy Savings (CARES)
- Winter Help

Although no further notices will be provided, Cascade Natural Gas Corporation is here to help you. If you have any questions, or need assistance please contact us.

PLEASE KEEP THIS PORTION FOR YOUR RECORDS.

Questions?

1-888-522-1130

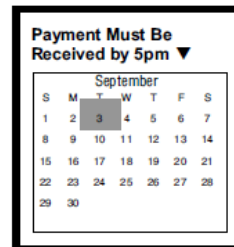
If you have any questions concerning your bill, payment locations, or payment arrangements, please contact Cascade Natural Gas Corporation between 7:30 a.m - 6:30 p.m., Monday - Friday. Billing information is not available after hours.

Payments are not accepted at the local office.

After hours emergency, call:

1-888-522-1130

Si necesita ayuda de traduccion, llame Cascade Natural Gas Corporation



8. Agent-led outbound calls (unscripted)

9. Energy Assistance door hanger prior to disconnection of service.

See Attachment A "240008-CNGC-Resp-TEP DR-19-Attach A.pdf" to Cascade's Response to TEP Data Request No. 19.

9. Field Door Hanger upon disconnection of service.

See Attachment B "240008-CNGC-Resp-TEP DR-19-Attach B.pdf" to Cascade's Response to TEP Data Request No. 19.

**ATTACHMENT A to Cascade's Response
to THE ENERGY PROJECT Data Request
No. 19**

EXH. SNS-7

Important information regarding your Cascade Natural Gas account



Cascade Natural Gas understands that occasionally our customers experience financial difficulties. In an effort to serve our community, Cascade Natural Gas has established the **Cascade Arrearage Relief and Energy Savings (CARES)** program.

As a customer who currently has a past due balance, you may qualify for help with your past due balance as well as a monthly discount on your bill.

Cascade Natural Gas sincerely invites you to apply for this no-strings-attached help by contacting your local Community Action agency. You can find contact information for your local agency at www.cngc.com/help or by calling Cascade Customer Service at 888-522-1130.

Receiving CARES assistance does not disqualify you from receiving other assistance – e.g., from the Low-Income Home Energy Assistance Program (LIHEAP). Your local Community Action agency is available to assist with LIHEAP and other assistance programs.

Extended payment arrangements are also available through Cascade. Thank you for being a valued customer.

Customer Service
Monday-Friday
7:30 a.m. – 6:30 p.m.
888-522-1130

www.cngc.com



In the Community to Serve®

EXH. SNS-7

Información Importante Sobre Su Cuenta de Cascade Natural Gas



Cascade Natural Gas entiende que ocasionalmente nuestros clientes experimentan dificultades financieras. En un esfuerzo por servir a nuestra

comunidad, Cascade Natural Gas ha establecido el programa **Cascade de alivio de atrasos y ahorro de energía (CARES)**.

Como cliente que actualmente tiene un saldo vencido, puede calificar para recibir ayuda con su saldo vencido, así como un descuento mensual en su factura.

Cascade Natural Gas lo invita sinceramente a solicitar esta ayuda sin condiciones comunicándose con su agencia local de Acción Comunitaria. Puede encontrar información de contacto de su agencia local en www.cngc.com/help o llamando al Servicio de Atención al Cliente de Cascade al 888-522-1130.

Recibir asistencia CARES no lo descalifica para recibir otra asistencia, por ejemplo, del Programa de asistencia energética para hogares de bajos ingresos (LIHEAP). Su agencia de Acción Comunitaria local está disponible para ayudar con LIHEAP y otros programas de asistencia.

Los acuerdos de pago extendidos también están disponibles a través de Cascade. Gracias por ser un cliente valioso.

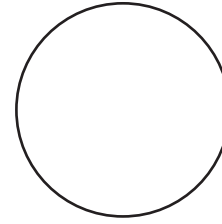
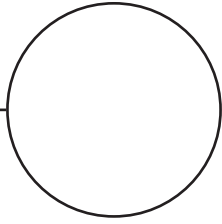
Servicio al Cliente
Lunes – Viernes
7:30 a.m. – 6:30 p.m.
888-522-1130



www.cngc.com

En la comunidad para servir.®

**ATTACHMENT B to Cascade's Response
to THE ENERGY PROJECT Data Request
No. 19**



In the Community to Serve®

Customer Service - Atención al Cliente

7:30 a.m.-6:30 p.m. Monday-Friday (Lunes a Viernes)

1-888-522-1130

www.cngc.com

**All Emergencies - 24-Hour Response
Todas Emergencias - 24 horas
(Including Outages)**

1-888-522-1130

PAY ONLINE 24/7 for FREE using our Online Account Services at **www.cngc.com**.

PAY BY PHONE 24/7: 1-833-425-1694 with a Credit or Debit Card. Paymentus®, our independent service provider, charges a convenience fee of \$1.89 for each transaction. Have your 11-digit Cascade Natural Gas account number handy.

Please notify Cascade Natural Gas if your payment is past due and you choose to pay at our pay station or pay electronically.

IMPORTANT INFORMATION

Disconnection of service may be postponed upon receipt of a certificate from a licensed physician or a public health official stating you or someone in your household has a serious illness or medical emergency that would be impaired by the loss of service.

Financial assistance is available for those who qualify by contacting Cascade Natural Gas Customer Service.

A complaint may be filed with Cascade or the Commission.

- Public Utility Commission of Oregon: 1-800-522-2404 or write to PO Box 1088, Salem, OR 97308-1088, www.oregon.gov/puc
- Washington Utilities and Transportation Commission: write to PO Box 47250, Olympia, WA 98504-7250 or call 1-888-333-9882, www.utc.wa.gov
- Cascade Natural Gas Corporation: 1-888-522-1130 or write to PO Box 7608, Boise, ID 83707-1608, www.cngc.com



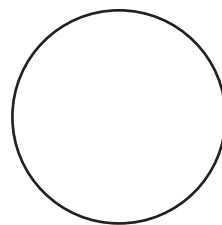
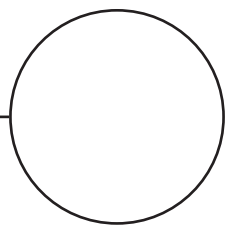
In the Community to Serve®

**IMPORTANT NOTICE!
¡AVISO IMPORTANTE!**



**Know what's below.
Call before you dig.**

Date: _____
 Time: _____
 Host Job# - FA ID: _____



**YOUR IMMEDIATE ACTION REQUIRED
 SE REQUIERE ACCIÓN INMEDIATA**

(See checked box)

**GAS SERVICE HAS BEEN DISCONNECTED FOR
 THE FOLLOWING REASON(S):**

El servicio de gas ha sido desconectado por la siguiente razón:

- Failure to pay your past-due bill of \$ _____.
 ▪ *Fracaso de pagar su cuenta atrasada.*
- Misrepresentation of identity.
 ▪ *Falsificación de identidad.*
- Failure to sign up for service.
 ▪ *Falta de registrarse al servicio.*
- Illegal use of natural gas service.
 ▪ *Uso ilegal del servicio de gas natural.*
- In order to provide service for your neighbor.
 ▪ *Proporcionando el servicio a su vecino.*
- Dangerous or unsafe conditions.
 ▪ *Condiciones peligrosos.*
- System maintenance.
 ▪ *Mantenimiento del Sistema / Medidor.*
- Shut off per your request.
 ▪ *Apago de acuerdo con su solicitud.*
- Company outage.
 ▪ *Interrupción del servicio.*
- Other _____.
 ▪ *Otro razon.*

**For restoration of service - Para restablecer servicios
 Call Customer Service - Llame a Atención al Cliente
 1-888-522-1130**

- We need additional information regarding your account.
 Necesitamos información adicional sobre su cuenta.**
 Please contact Customer Service by 5 p.m. in order to avoid disconnection of service.
 ▪ **ON THIS DATE :** _____
Para evitar desconexión de servicio, por favor comuníquese con Atención al Cliente antes de las 5 p.m. en la fecha indicada.
- 24-HOUR NOTICE: Contact Customer Service within 24 hours to avoid disconnection of service. If you cannot pay your bill in full, arrangements can be made. If service is disconnected, you may be charged a reconnect fee and/or deposit.**
 ▪ **Noticia de 24 horas:** *Comuníquese con Atención al Cliente dentro de 24 horas para evitar desconexión de servicio. Si no puede pagar su cuenta en total, se pueden hacer arreglos de pago. Si el servicio es desconectado, se le puede cobrar cargos de reconexión i/o un depósito.*

**INFORMATION REQUESTED
 INFORMACIÓN SOLICITADA**

(See checked box)

- To ensure correct gas measurement, we periodically test gas meters for accuracy. We must remove and replace your meter, then relight gas appliances. Contact Customer Service for access arrangements to avoid extended service interruption.
- We could not gain access to your gas meter. To remain in compliance with regulations specified by the Public Utility Commission, we require 24/7 access to the meter at all times.
- A service technician was here in response to your request, but did not find you home. Contact Customer Service to reschedule your service order.
- A service technician installed a device below ground near your gas meter to prevent corrosion of the gas line. If you have any questions, contact Customer Service.
- Our representative performed routine maintenance on your gas meter today. If you have questions, contact Customer Service.
- System maintenance is required on your service line. Our construction crew must interrupt your gas service to perform the required maintenance.
- Due to an unplanned outage or related issue affecting your service, we need access to your meter and gas appliances to reinstate service, please call the Customer Service Emergency line listed on the back.
- Tenant Notification: Gas Service has been transferred out of your name due to non-payment of your past-due bill of \$ _____. Contact Customer Service to reinstate service back into your name.
- Tenant Notification: Gas service is being disconnected. Contact your Landlord or call Customer Service to assume financial responsibility.
- Please call _____ in relation to the issue checked above. If this box is not checked, please call Customer Service at 1-888-522-1130.**

Comments _____

