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January 13, 2022

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3612

**RE: UM 2211 - Comments of Cascade Natural Gas Corporation Regarding HB 2475
Implementation of Differential Rates and Programs in Oregon**

Cascade Natural Gas Corporation (“Cascade” or “Company”) submits the following comments in response to the “Strategy Update and Interim Action Straw Proposal” (“Proposal”) filed by the Staff of the Public Utility Commission of Oregon (“Staff”) in Docket No. UM 2211 on December 22, 2021. Cascade appreciates the opportunity to file these comments and looks forward to the continued work with Staff and other parties within this docket.

Interim Action Framework

Regarding Staff’s proposed interim action framework, Cascade observes that Staff proposes to have “Gas utilities focus on proposing enhanced bill assistance for interim relief by Q1 2022 to address winter heating balances that will accrue before an interim rate can be put in place.” Cascade has already implemented such interim action by introducing its arrearage management program “Big HEART” to help with financial hardship due to the COVID-19 pandemic. Cascade also has its Oregon Low-Income Bill Assistance (“OLIBA”) program to provide low-income bill assistance funding to those who qualify.

Cascade feels its customers would be better served if it focused its efforts on designing a program that is more comprehensive in nature and is effective for October 2022 rather than put in place a temporary program that will change later after further evaluation and identifying program flaws. The next few months prior to program implementation in October 2022 gives Cascade and its stakeholders time to design a program that is more effective and likely more successful in addressing our customers’ needs and the energy burden placed on those less fortunate.

Proposed Baseline Evaluation Criteria for Interim Rates or Programs

Cascade is supportive of many of Staff’s proposed baseline evaluation criteria. However, there are a few exceptions and a few clarifications that the Company feels necessary to comment on as follows:

- Cascade fully supports streamlining eligibility through options such as self-attestation or auto enrollment for recipients of energy assistance, but actual income verification poses a problem

for Cascade because we do not maintain customer income records or financial data or household size on its customers.

- Cascade is hesitant to require the bundling of an energy efficiency requirement into such offerings, as not all customers will willingly participate in such an offering and many of Cascade's OLIBA customers are renters who are not receiving the benefit of an energy efficiency program.
- Reporting on individual customers on a monthly basis by zip code is very labor intensive. Perhaps this requirement could be modified to quarterly, semi-annual, or annual reporting.

Cascade appreciates the opportunity to comment. If you have any questions, please feel free to contact me at christopher.mickelson@cngc.com or 509-734-4549.

Sincerely,

/s/ Christopher Mickelson

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