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April 27, 2022

Oregon Public Utility Commission  
Attn: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

**RE: LC 76 Cascade Natural Gas Corporation's 2020 Integrated Resource Plan ("IRP")**

Attention: Filing Center

Enclosed for filing is Cascade Natural Gas Corporation's (Cascade or Company) 2020 Integrated Resource Plan Update.

Cascade thanks OPUC Staff and the other stakeholders for the feedback, suggestions, and guidance we received that greatly assisted Cascade's 2020 IRP and the 2020 IRP Update in meeting today's milestone. Cascade looks forward to working with OPUC Staff and other stakeholders in the next IRP process.

If there are any questions regarding this request, please contact me at (509) 734-4589 or via email at [mark.sellers-vaughn@cngc.com](mailto:mark.sellers-vaughn@cngc.com) or Brian Robertson at (509) 221-9808 or via email at [Brian.Robertson@cngc.com](mailto:Brian.Robertson@cngc.com).

Sincerely,  
CASCADE NATURAL GAS CORPORATION

Mark Sellers-Vaughn  
Manager, Supply Resource Planning

LC 76 CNGC Enclosed

LC 76 CNGC 2020 OR IRP Update.pdf  
LC 76 CNGC Attachment A – Distribution System Planning.pdf  
LC 76 CNGC Attachment B – IRP Stakeholder Engagement.pdf



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**2020 OR IRP Update**

April 27, 2022

## **Introduction**

Cascade Natural Gas Corporation (Cascade or the Company) is a public utility serving more than 309,600 customers, with approximately 81,000 in Oregon and 228,600 in Washington. The Company's customers are located in 96 communities, 28 of which are in Oregon and 68 in Washington. Cascade's service territory is concentrated in central and eastern Oregon, and in western and central Washington. Cascade is subject to the jurisdictions of the Public Utility Commission of Oregon (OPUC or Commission) and the Washington Utilities and Transportation Commission (WUTC) regarding rates, terms, and conditions of service.

Consistent with the requirements in Oregon and Washington, Cascade prepares and files an Integrated Resource Plan (IRP or Plan) which is a long-term plan for acquiring the necessary resources to deliver a sufficient supply of natural gas to its firm service customers over a twenty-year timeframe. The IRP presents a forecast of customer growth and customer usage, as well as an analysis of the supply and demand side resources that could most reliably and cost effectively be used to meet future core customers' gas requirements.

Cascade filed its most current IRP on July 31, 2020, in Docket No. LC 76. By Commission Order No. 21-127, the Plan was acknowledged effective April 27, 2021. As part of the acknowledgement letter, Cascade agreed to host at least one workshop to present distribution upgrade information to OPUC Staff and stakeholders, and additional workshops as necessary. In this annual update, Cascade will address action items from Cascade's 2020 OR IRP as well as OPUC Staff recommendations that require an update from Order No. 21-127.

## **Overview of Requirements**

The requirements for an IRP are established in OAR 860-027-0400 and Order Nos. 07-002, 07-047, and 08-339. Acknowledgement of an IRP is the Commission's action to represent these requirements have been met with a focus on the utility's two- to four-year action plan.

A year after an IRP is acknowledged, a utility is required to file an update to its IRP that describes the actions it has taken to implement its acknowledged action plan, to provide an assessment of significant changes since the plan was filed, and to discuss any deviations from the action plan. Those actions as well as actions taken on the Staff recommendations for the 2020 OR IRP Update are described on the following pages.

**Action Item 1:**

*Attend other regional Local Distribution Companies' IRP meetings.*

**Update:** The Company has had a representative at Northwest Natural's IRP meetings that began on January 14, 2022, PSE's IRP meetings, and Avista's IRP meetings that began on February 16, 2022. Cascade also participated in Intermountain Gas' IRP, Northwest Power and Conservation Council's Power Plan, and PacifiCorp's IRP throughout 2021. Cascade looks forward to continuing to participate in other regional LDC IRP processes.

**Action Item 2:**

*Work with Northwest Pipeline (NWP) on realigning Maximum Daily Delivery Obligation (MDDOs).*

**Update:** Cascade has continuously met with NWP to discuss realigning MDDOs throughout 2021 and 2022. Currently, there have not been any opportunities that would benefit the Company to realign. Cascade will continue to update the OPUC through the 2023 OR IRP Process.

**Action Item 3:**

*Determine if the temporary Jackson Prairie contract should be made permanent.*

**Update:** On April 14, 2020, Cascade's Gas Supply Oversight Committee (GSOC) authorized the Gas Supply Department to work with PSE to make the then-current TF-1 capacity release of 2,000 dth/d to PSE permanent in exchange for PSE making a permanent release of 178,460 dths of SGS-2 storage capacity ("JP3"), with corresponding TF-2 transportation capacity of 6,077 dths/d. GSOC made this decision based on several factors. The addition of JP3 the last ten years has enhanced system operational flexibility and reliability without negatively impacting the Company's ability to serve the Wenatchee lateral. Cascade modeling does not foresee upstream transportation capacity issues along the Wenatchee lateral over the current 20-year planning horizon. Also, while Cascade has primarily used storage for system balancing, there has also been a level of price arbitrage possible with JP3.

**Action Item 4:**

*Develop modeling scenarios that represent Pipeline Operational Flow Orders (OFOs).*

**Update:** Cascade has encountered two externalities that have delayed modeling scenarios that represent OFOs. The first is carbon compliance modeling, which has become a top priority for the Company. Cascade's resource planning team has spent the past year planning for the Climate Protection Plan and has had significant involvement in the Natural Gas Fact Finding docket that resulted from Oregon Executive Order 20-04. Cascade has also contracted with a vendor to replace the Company's upstream optimization model. The Company has met with this new vendor weekly in order to get up-to-speed and enable Cascade to use this model for the next IRP. Cascade will update the OPUC through the 2023 IRP on the development of scenario modeling that represent OFOs.

**Action Item 5:**

*Improve the alignment of resource/costs between the Purchased Gas Adjustment (PGA) and the IRP.*

**Update:** Cascade has enhanced the PGA with extensive SENDOUT® integration. In the past, parts of the PGA totals such as transportation costs have varied from SENDOUT®. The fact that it varies wasn't a concern, in fact a small variance in transportation costs is expected. This is due to the PGA having a contractual perspective and SENDOUT® being able to make operational decisions. Through integration, Cascade has reduced the transportation cost variance to under 20%, with a future expectation of reducing the variance even more. Other costs, such as storage costs, now match exactly with a 0% variance. With further integration, Cascade expects to have a sub 5% variance in each cost category (Total Gas Costs, Avg Cost of Demand, Avg Purch Rate, Avg Demand Rate, Storage Costs, Storage Other Costs, Supply Commodity, Transportation Commodity, and Demand Costs).

The integration involved creating tabs in the PGA that absorb reports from SENDOUT® and distribute the data to other relevant tabs. This tab is labeled "SENDOUT Inputs" and it takes information directly from SENDOUT® reports and feeds the rest of the workbook. There are other tabs as well that act in this manner except the information comes from other internal reports. For example, Cascade made a storage tab that directly absorbs an internal storage report and feeds the rest of the workbook. Another tab that was created was the 'Mark-to-Market Input' tab which absorbs pricing data and feeds the workbook. Another tab is the 'Rates and Units' tab, which shows a breakdown of GTN rate costs that helps consistency of rates between the PGA and SENDOUT®.

Cascade will continue to enhance the integration of the PGA and SENDOUT® to better ensure alignment of resources and costs.

**Action Item 6:**

*Develop more scenarios that address changing Canadian Markets.*

**Update:** Cascade has a unique opportunity to study the extreme movements in Canadian Markets that occurred in the second half of 2021 and will do so to develop and model scenarios based on these observed market conditions. These will be presented to stakeholders during TAG 3 of the 2023 IRP process.

**Action Item 7:**

*Add Renewable Natural Gas (RNG) as a candidate portfolio.*

**Update:** Cascade will be including a renewable resource-only portfolio, to compete with other portfolios in Step 3 of the Company's Supply Resource Optimization Process (see Figure 9-2 of the 2020 IRP for reference). The portfolio will select an optimal mix of theoretical on and off system biogas and hydrogen, with the inputs for the maximum quantities and costs of these resources being informed by the analysis performed by Cascade for Docket UM 2178. This will be presented to stakeholders during TAG 4 of the 2023 IRP process.

**Action Item 8:**

*Work with Staff and Stakeholders to develop a more effective presentation for the severity of negative outcomes. Cascade will report on the status of this action item when filing the 2021 [2020] OR IRP Update.*

**Update:** Cascade will allocate more time during TAG 4 to present in-depth to stakeholders the Company's methodology for quantifying severe negative outcomes. The Company will also allow for additional time during TAG 5 to present and discuss with stakeholders any extreme negative outcomes that may result from Cascade's Scenario/Sensitivity analysis, if applicable.

**Staff Recommendation:**

*Provide potential RNG program revenue from Washington voluntary RNG Service program, and, as applicable, any and all other revenue related to RNG activities.*

**Update:** Cascade is still in the planning stages of RNG and does not currently have a voluntary RNG service. Cascade's goal is to integrate much of the Washington voluntary RNG service into Oregon to make it available to Oregon customers as well. An item that Cascade is still working through is ensuring that the voluntary RNG service integrates the current legislated carbon compliance programs that are coming out of both states. Cascade will keep the OPUC updated throughout the 2023 IRP process.

**Staff Recommendation:**

*As applicable, provide RNG revenues that could be derived from participation in California's LCFS market and/or Oregon's Clean Fuels Program.*

**Update:** Similar to the previous response, Cascade is still in the planning stages of RNG. The impacts of RNG and RNG revenue have yet to be determined as there are still questions regarding how the Company's RNG programs will interact with the current legislated carbon compliance programs coming out of both states. Cascade will keep the OPUC updated throughout the 2023 IRP process.

**Staff Recommendation:**

*Include an RNG case scenario that reflects DEQ's [Oregon Department of Ecology] Climate Protection Program design elements, insofar as program details are available.*

**Update:** It is the Company's position that compliance with the DEQ's Climate Protection Program will be a necessary part of its resource optimization process, and as such many elements of the program will be incorporated into Cascade's base case modeling. The Company will also explore including some of the scenarios that were evaluated during its UM 2178 modeling, such as lower than expected RNG availability.

**Staff Recommendation:**

*Host at least one workshop to present distribution upgrade information to Staff and stakeholders, and additional workshops as necessary.*

**Update:** On November 23, 2021, Cascade held a distribution upgrade information meeting where Cascade presented distribution system plans for which the Company is seeking acknowledgement through the 2020 IRP Update Process. The distribution system plans that were presented are listed below and the details are described in attachment A.

**Staff Recommendation:**

*Host a workshop with Staff prior to or at the beginning of the 2022 [2023 IRP] cycle to consider options for improved communication among the Company and stakeholders.*

**Update:** Cascade held a very productive conversation with Staff to consider options for improved communication among the Company and Stakeholders. Cascade prepared a Stakeholder Engagement document, which is provided in Attachment B, that provides the Company and Stakeholder commitments which are intended to coordinate communication throughout the IRP process and lay out mutual expectations. Staff provided very useful feedback that led to several edits to the Stakeholder Engagement document, and therefore the stakeholder engagement process, which will effectively improve the IRP process. Cascade looks forward to working with Staff and other Stakeholders during the 2023 IRP cycle to producing a well-rounded 2023 IRP.

**Conclusion**

Cascade has provided an update to Staff on action items from the 2020 Oregon IRP as well as Staff recommendations from the LC-76 acknowledgement letter. In addition to those updates, Cascade is seeking acknowledgment on the distribution system plans that were presented during the November workshop. Cascade thanks Staff and stakeholders for their feedback and look forward to working collaboratively with all stakeholders during the 2023 IRP cycle.



## Introduction

To assess Cascade distribution systems for growth, the Company uses a distribution modeling system called Synergi Gas. Cascade's Synergi models incorporate total customer loads, existing pipe and system configurations along with current distribution system capacities. To evaluate the distribution system for the five-year growth predictions, Cascade adds in growth predictions to the models and then evaluates the system for deficits. System deficits can be defined as a critical system that is at or limiting capacity. Some examples of system deficits can include a low-pressure area that is experiencing growth that needs to be reinforced to support continued growth in the area, a gate station that is at or near capacity or a lateral that is at capacity and is experiencing pressure loss at the end of lateral which could compromise operations to downstream facilities. If any such deficit occurs, then the system capacity enhancements are evaluated, capacity enhancement alternatives are compared in the optimization model, and a final capacity enhancement is selected with consideration to cost, capacity increase, and long-term planning. After the capacity enhancement has been selected it is budgeted into Cascade's five-year budget based on when the capacity enhancement needs to occur to avoid capacity deficiencies.

In this document, Cascade will be going into detail on capital reinforcement projects that are estimated to be over \$500,000 and are currently in the five-year budget. Projects that meet this criterion include:

- Prineville Gate Upgrade
- Bend Gate Upgrade
- Baker City Reinforcement and New Gate Station
- Bend Shelvin Park Reinforcement
- Bend 6-inch HP Reinforcement/Replacement
- Ontario Reinforcement

For each project the following information will be summarized:

- Project summary
- System benefits
- Alternative considered
- Cost
- Timing

## **Prineville Gate Upgrade**

### **Project Summary:**

The Prineville gate, located on GTN northwest of Prineville, Oregon, is currently constrained on capacity and needs to be upgraded to meet IRP growth needs. The Prineville gate upgrade consists of replacing the existing gate with a new gate with increased capacity. The gate upgrade will consist of replacing the existing piping and facilities with new piping and facilities that are sized for future growth.

### **System Benefits:**

Current gate station will be replaced with larger piping and facilities that will allow for higher flows out of that gate station.

### **Alternative Considered:**

None, existing gate must receive additional capacity.

### **Cost:**

The expected cost of this project is estimated at \$2,300,000. Cost for the TransCanada gate upgrade is estimated at \$860,000 and the cost of the Cascade gate upgrade is \$1,550,000.

### **Timing:**

The gate upgrade will be designed in 2022 and will be constructed in 2023.

## **Bend Gate Upgrade**

### **Project Summary:**

The Bend gate, located on GTN on the east side of Bend, Oregon, is currently constrained on capacity and needs to be upgraded to meet IRP growth needs. The Bend gate upgrade consists of replacing the existing gate with a new gate that allows for increased capacity. The gate upgrade will consist of replacing the existing piping and facilities with new piping and facilities that are sized for future growth.

**System Benefits:**

Current gate station will be replaced with larger piping and facilities that will allow for higher flows out of that gate station.

**Alternative Considered:**

None, existing gate must receive additional capacity.

**Cost:**

The expected cost of this project is estimated at \$2,730,000.00. Cost for the TransCanada (GTN) gate upgrade is estimated at \$860,000 and the cost of the Cascade gate upgrade is \$1,870,000.

**Timing:**

The gate upgrade will be designed in 2023 and will be constructed in 2024.

**Baker City Reinforcement and New Gate Station****Project Summary:**

New gate station on the northwest side of Baker City with a 1,200 foot 6-inch PE reinforcement tied into the existing distribution system.

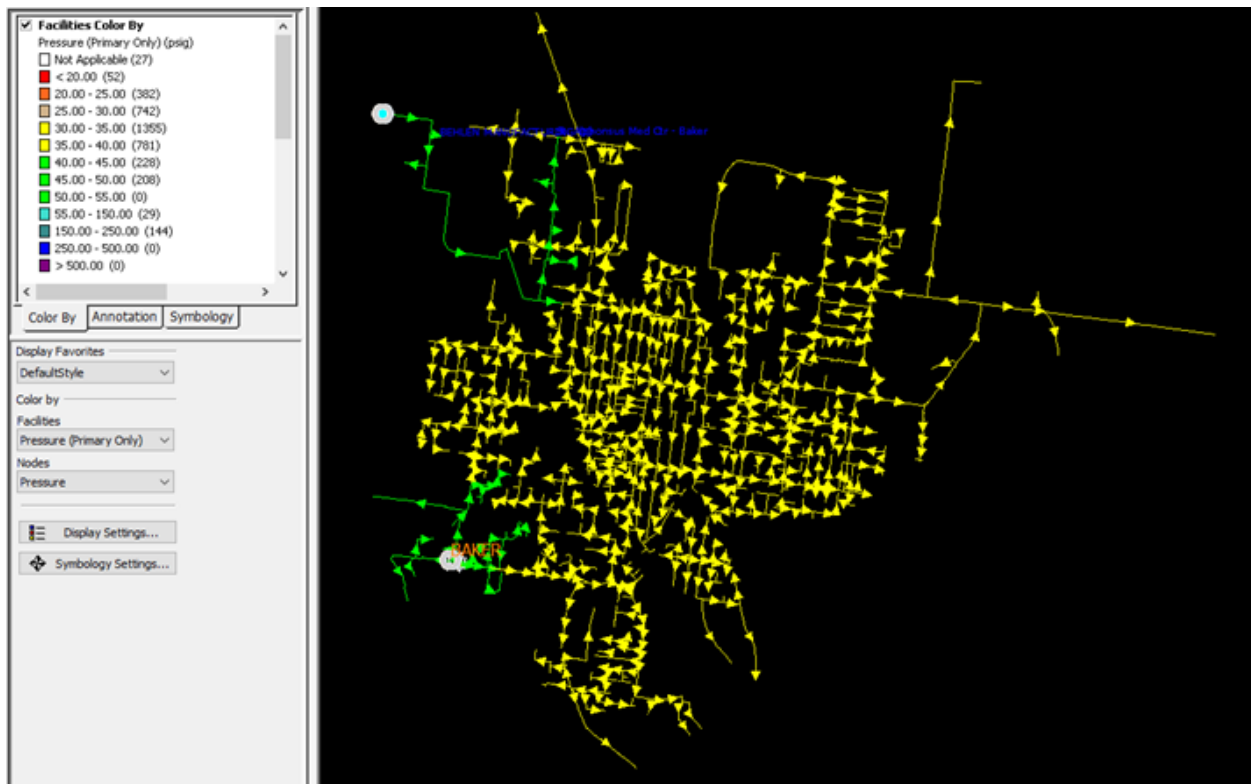
**System Benefits:**

New gate station provides a secondary/redundant feed to Baker City. The new gate and PE reinforcement provides additional capacity to support growth in Baker City. The new gate and PE reinforcement boosts design day pressures on the east side of Baker City, see Figure 1 and Figure 2. This reinforcement will boost design day pressures on the east side of Baker City from under 20 psig up to 35 psig.

Figure 1: Baker City model before proposed reinforcement



Figure 2: Baker City model after proposed reinforcement



Alternative Considered:

An alternative considered was to increase the capacity of the existing gate station and complete a reinforcement from the gate to the east side of Baker City to carry pressures and flows deeper into the distribution system. This option would have required significantly more piping and cost than the 1,200 ft of 6 in PE proposed to get the same capacity gain/pressure increase on the east side of Baker City. The gate station cost is negligible since the cost of upgrading an existing gate station is comparable to the cost of installing a new gate station, since both the proposed reinforcement and alternative require a gate upgrade.

**Cost:**

The expected cost of this project is estimated at \$1,750,000.00. Cost for the gate upgrade is estimated at \$1,400,000 and the cost of the 1,200 ft 6 in PE reinforcement is estimated at \$356,000.

**Timing:**

This project will be constructed in 2022.

## **Bend Shelvin Park Reinforcement**

**Project Summary:**

High pressure main extension and new regulator station on the westside of Bend as show in red in Figure 3. Project will consist of extending 1.8 miles of 6-inch steel high pressure pipe.

**Figure 3: Shelvin Park Reinforcement Overview****System Benefits:**

This project will extend high pressure into the west side of Bend. This will eliminate the need to bypass during cold weather events. Over the last couple of years, the west side of Bend has experienced significant pressures issues requiring manual bypassing to maintain pressure. New regulator station boosts distribution pressure on the west side of Bend as shown in Figure 4 and Figure 5. This reinforcement will take the distribution system pressure on design day from 15-20 psig up to 40-45 psig. Reinforcing the west side of Bend will support the significant growth we have seen and expect to continue to see on the west side of Bend as subdivisions expand west to Mt Bachelor, which is a very popular recreation area.

Figure 4: Bend model before proposed reinforcement

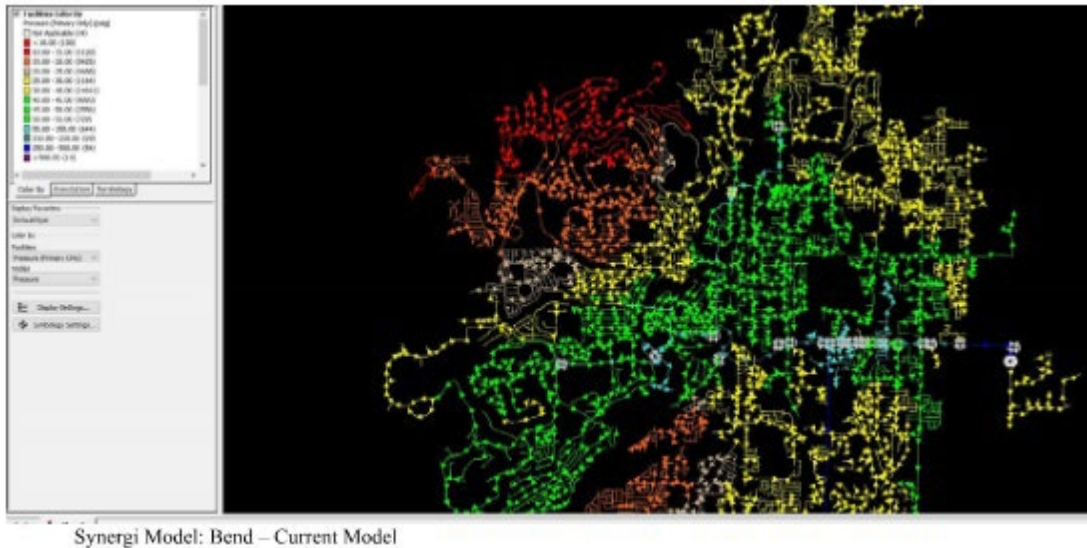
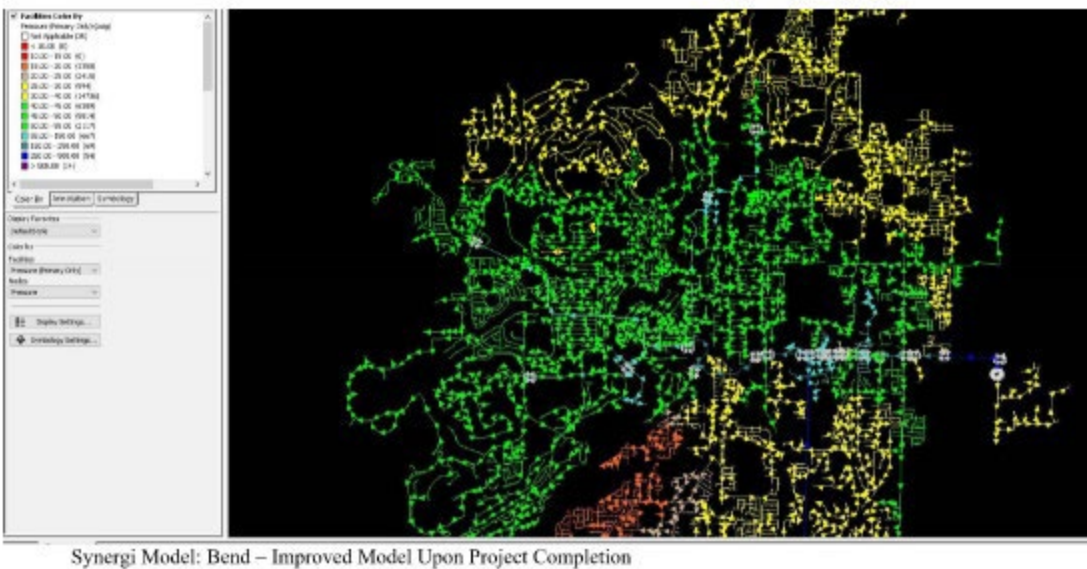


Figure 5: Bend after proposed reinforcement



**Alternative Considered:**

None with similar scope. The only other alternative that has been discussed is installing a new gate station north of Bend near the airport with approximately 8.5 miles of high-pressure steel running into the westside of Bend with regulator stations tied into the distribution system to boost pressures and flow to the westside of Bend. This option is not being considered since it has significantly higher costs, it would require a new gate station and an additional 7.5 miles of high-pressure steel in addition to route challenges that include a Deschutes River Crossing.

**Cost:**



The expected cost of this project is estimated at \$2,620,000. Cost for the 6 inch HP is estimated at \$2,500,000 and the cost of the regulator station is estimated at \$135,000.

**Timing:**

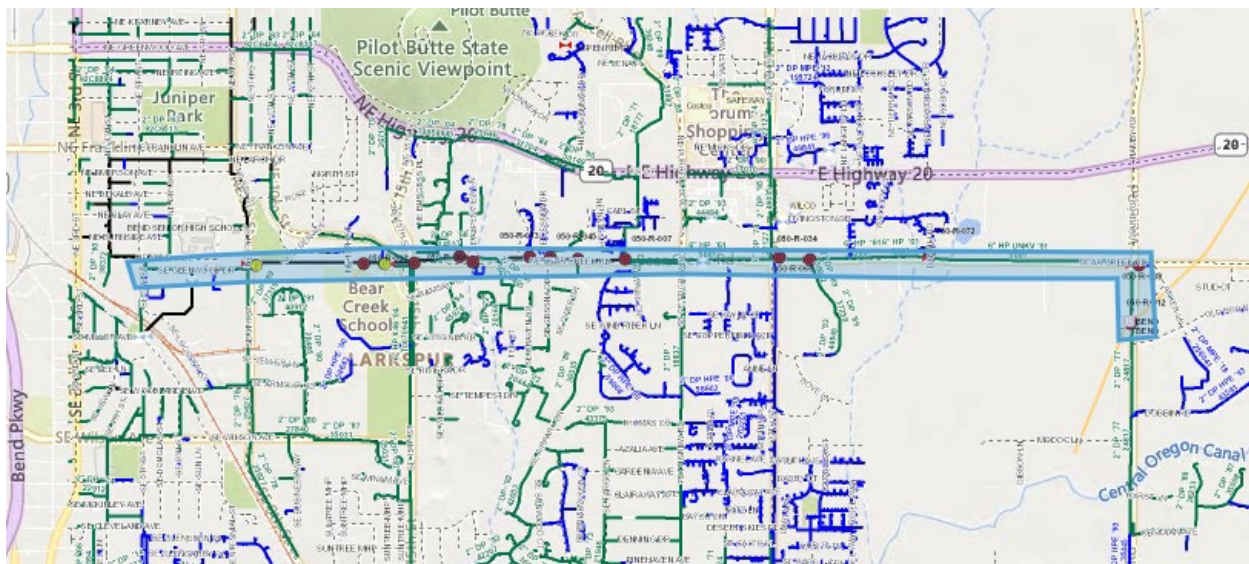
This project will be constructed in 2022.

## Bend 6-inch HP Reinforcement/Replacement

**Project Summary:**

Bend 6-inch HP Line as shown in Figure 6 is planned to be replaced to address depth concerns. The line currently has locations which cover less than 6 inches. As this line is replaced it will be replaced with a larger size diameter pipeline to support long term growth expected in Bend.

**Figure 6: Bend 6-inch HP Reinforcement/Replacement Overview**



**System Benefits:**

Supports long term growth throughout Bend. The 6-inch Bend HP Line supports flows out of the Bend and South Bend gate stations which are the two gate stations that supply gas to the Bend system. Replacing this line will allow the line to be resized to accommodate long term growth and planning for the Bend system. This project will eliminate the current need to bypass during winter months from the south Bend gate due to high flows/velocities on this line which causes pressure loss down the Bend HP system which is an operations concern. Replacing this line will also address integrity concerns related to shallow cover/depth.



**Alternative Considered:**

None with similar scope since the HP lateral out of the two Bend gate stations needs additional capacity to support growth. An alternative as discussed earlier would be a new gate station north of Bend near the airport with approximately 8.5 miles of high-pressure steel running into the westside of Bend with regulator stations tied into the distribution system and a high pressure back feed into the existing Bend HP system. This option was not considered since it requires an additional gate station and additional pipe footage and does not address the integrity concerns on the existing line.

**Cost:**

The expected cost of this project is estimated at \$7,500,000 which will be completed in phases over multiple years.

**Timing:**

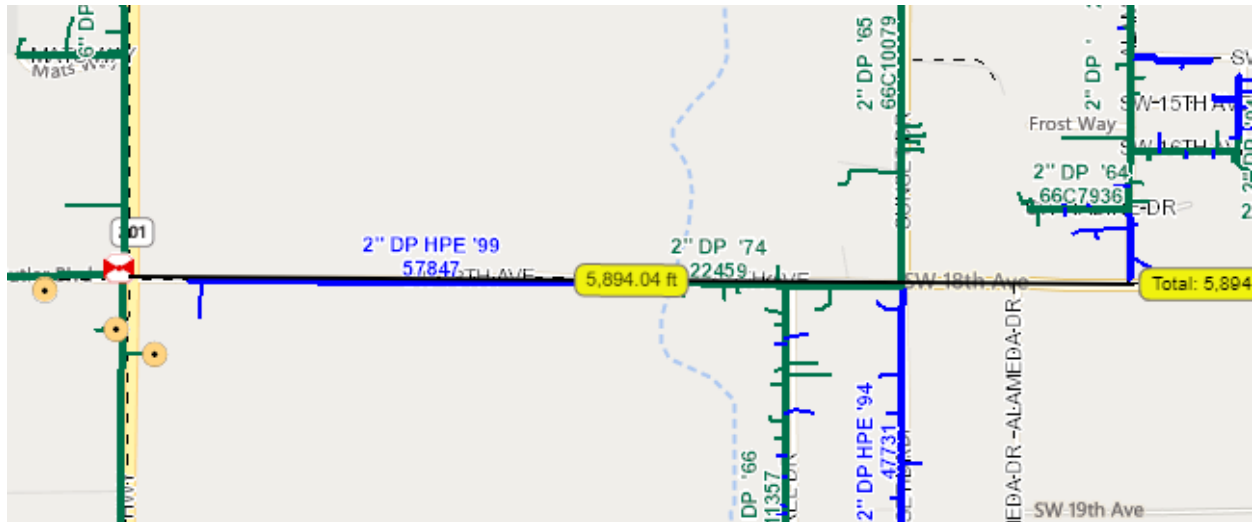
This project will be designed and constructed over multiple years in the following phases:

- Phase 1 & 2 have been completed
- Phase 3: 2022 Design & 2023 Construction
- Phase 4: 2023 Design & 2024 Construction
- Phase 5: 2024 Design & 2025 Construction
- Phase 6: 2025 Design & 2026 Construction

**Ontario Reinforcement****Project Summary:**

Install new regulator station and 6,000 ft of 4-inch PE along SW 18th Ave in Ontario, see Figure 7.

Figure 7: Ontario Reinforcement Overview



**System Benefits:**

New regulator station and 4-inch PE trunkline boosts pressure and flows to the south and east side of Ontario as shown in Figure 8 and Figure 9. This reinforcement will boost design day pressures in south Ontario from 25 psig to 35 psig. New regulator station will provide a second feed to the Ontario distribution system from the south. This reinforcement will allow for smaller reinforcements to support growth to the south and east side of Ontario.

Figure 8: Ontario before proposed reinforcement

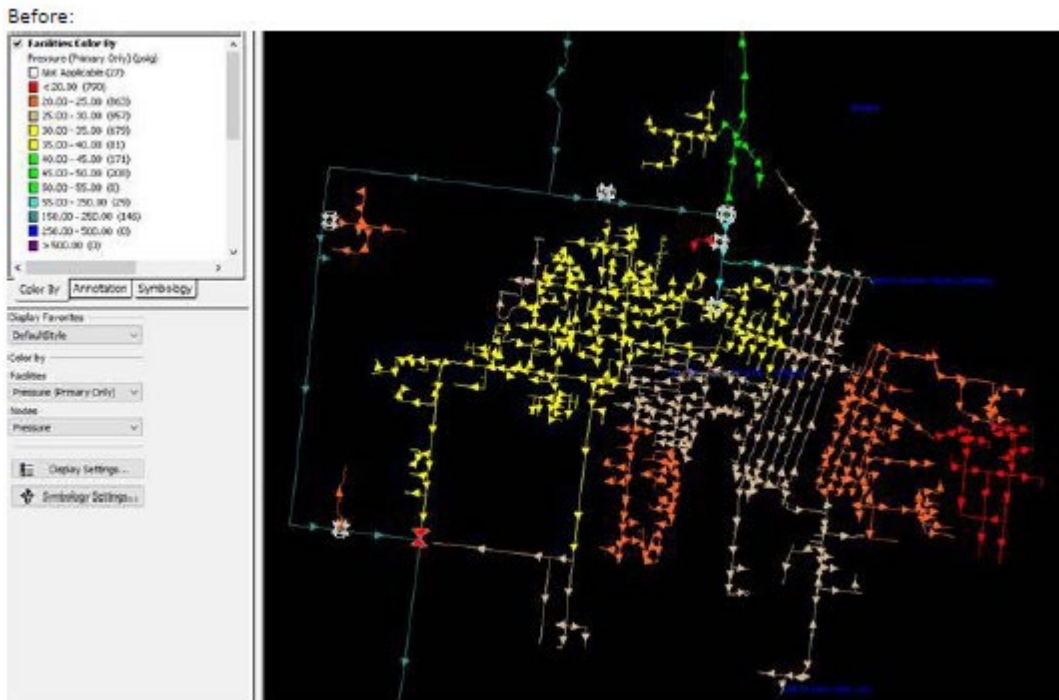


Figure 9: Ontario after proposed reinforcement

After Main Installation and Station Installation:



#### Alternative Considered:

None with similar scope. An alternative would be installing a larger sized trunk line from the existing regulator station to the south side of Ontario, this option would require 8,500 ft of pipe vs the 6,000 ft of pipe proposed and would not provide any redundancy to the system since Ontario would still only have one regulator station serving the distribution system.

#### Cost:

The expected cost of this project is estimated at \$1,230,000.00. The new regulator station is estimated at \$148,000 and the 4-inch PE reinforcement is estimated at \$1,080,000.

#### Timing:

The regulator station for this project will be constructed in 2022 and the 4-inch PE reinforcement will be constructed in 2023.

**Budgeted Reinforcements under \$500,000**

2022

- Pendleton 4-inch HP Reinforcement - \$357,000
- Pendleton 4-inch HP Reinforcement - \$321,000

2023

- Pendleton 4-inch PE Reinforcement - \$485,000
- South Hermiston HP Back feed Study- \$306,000

**Conclusion**

This summarizes Cascade Natural Gas' five-year plan for reinforcement needs to support growth in Oregon. As part of Cascade's IRP process reinforcements proposed will be reassessed in the 2023 IRP based on growth projections in the next IRP. To continue to meet the growth needs of our system, Cascade's five-year budget will be updated as needed to ensure we can meet growth estimates projected to ensure reliable service to our customers.



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# CASCADE NATURAL GAS STAKEHOLDER ENGAGEMENT DESIGN DOCUMENT

[Abstract](#)

This document contains the rational, assumptions, and explanation behind the Stakeholder Engagement process of Cascade's IRP Process

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## Introduction

Cascade welcomes input from technical experts and the interested public in developing its Integrated Resource Plan (IRP). Cascade seeks to employ best industry practices and recognizes external participation can add incremental improvements.

Cascade recognizes stakeholders have a multitude of projects before them. This Design Document is intended to assist in optimizing participation by interested parties to yield a solid IRP to the benefit of customers and the Company.

## Purpose


The goal of the IRP process is to produce a plan that addresses meeting long-term load giving consideration to the best combination of expected costs and associated risks and uncertainties for the utility and its customers. Cascade strongly believes this process is best accomplished with input from all stakeholders.

The purpose of this document is to align perspectives for maximizing the effectiveness, influence, and amount of contributions from stakeholders in an environment of robust workloads by all parties. The stakeholder engagement process is summarized in Box #1.

### Box #1: From OPUC 5/15/18 Workshop

**Stakeholder Engagement Process**

- Input and feedback from Cascade’s Technical Advisory Group (TAG) is an important resource to help ensure the IRP includes perspectives external to the Company and responsive to stakeholders.
- Five Technical Advisory Group (TAG) meetings were held in Salem and Portland, OR, and Kennewick, WA.
- Informal workshops with various stakeholders were held as requested.
- Multiple opportunities for public participation were available.



## Principles

Cascade applies the following four principles throughout this Design Document and the overall IRP process.

- A quality stakeholder engagement process is an iterative activity that requires collaboration and commitment

- Input from diverse perspectives improves the resulting IRP
- Removing barriers to participation and communicating in clear language with solid data is critical
- Transparency, and availability of Cascade staff for associated discussions, is central to the IRP process

## Context

This Design Document is provided with the understanding that some organizations (e.g., Commission Staffs) may rotate its members through its various utility's IRP processes as well as onboard new Staff. Thus, beyond memorializing Cascade's commitments, this Document can be a primer for analyst-to-analyst mutual expectations.

Cascade's perspective is to capture the benefits of interested parties' knowledge by seeking to implement best-practices of stakeholder engagement, beyond this simply being a regulatory requirement.

## Mutual Expectations

The Company will commit to the following series of actions for an efficient process to enhance stakeholders' participation. In turn, Cascade hopes that participating stakeholders will agree to general expectations on their part. The following Cascade and Stakeholder commitments are intended to coordinate communication throughout the IRP process and lay out mutual expectations.

### Cascade Commitments

1. The Company will provide reasonable accommodations for people with disabilities. Additionally, the Company will reasonably accommodate items such as requests for meeting locations, audio and visual capabilities, and other items requested by external stakeholders
2. Publishing an annual schedule of meetings, for calendaring and coordination purposes, to be included in the workplan
3. Publish a brief section that lists the recommendations from the previous Commission IRP acknowledgement
4. Providing meeting materials (agenda and PowerPoint) approximately 7 days in advance of meetings
5. Responding to pre- or post-meeting communication going over information of interest to stakeholders
6. Offering separate workshops (e.g., forecasting, SENDOUT®, DSM) as requested
7. Keeping a running list of action items from Technical Advisory Group (TAG) meetings that need to be further addressed if not directly related to the then-meeting topic or if more time is required to respond
8. Provide TAG minutes that include the action items from bullet #7 as well as any upcoming deadlines for feedback on the IRP.
9. Allowing for open, inclusive, and balanced participation and information sharing

10. Recognizing that some parties may not have the industry knowledge or the resources to devote to analyzing all aspects of the IRP and that their interest may be one of breadth
11. Understanding TAG members can and should speak up if they need more information or if the time for discussion is too short and merits further discussion
12. Responding to questions in a reasonable time period
13. Noting when confidential information has been requested (or provided) and associated treatment
14. Seeking perspectives on inputs and results of the components of the IRP
15. Present information in a clear and transparent manner

### Cascade Requests of Stakeholders

1. Ask questions of the Company on technical and methodological aspects
2. Be a point of contact within their organization to distribute information to peers or let Cascade know who should be on Cascade's direct distribution list.
3. Provide organizational positions, opinions, or perspectives to all stakeholders on various issues, while recognizing the following bullet point #4. (This is particularly relevant for organizations that have different lead analysts assigned to different companies or who have relatively new Staff members participating in any given IRP process.)
4. All should understand that some (e.g., Commission Staffs) organizational representatives cannot bind their organizations (i.e., Commissioners) but are making best efforts to provide relevant information
5. Recognize relative informality of the meetings and ability to interject for clarification and understanding
6. These requests of stakeholders are not to say, "speak now or forever hold your peace" or to put undue pressure on others' timelines and workload; rather these are ways to maximize the effectiveness of the stakeholders' comments, which optimizes the process. Again, comments received earlier in the process can better influence the final draft document.
7. When possible, provide feedback to meeting materials in advance of the meeting, to give Company representatives time to prepare information for an informed discussion.
8. Review bullet points #5 and #8 of Cascade's Commitments to ensure all action items are included and have been satisfactorily responded to by Cascade.

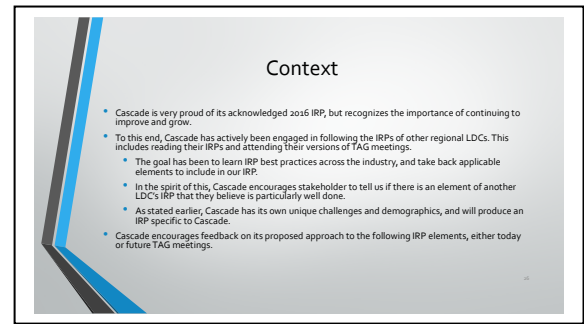
## Desired End-Result

A well-planned and executed stakeholder engagement process would have all technical and methodological issues examined in meetings prior to parties later providing comments on the final draft document. This is the proverbial win-win-win situation. Commission Staffs and interested parties would have full understanding of the Company's data and analytical approaches. These studies can be refined through analyst-to-analyst discussions. Consideration of new approaches can be put to the forefront for current or future IRPs, based on budgets and benefit to customers. The Company benefits by gaining access to perspectives perhaps not otherwise known. Commission Staff and others may be aware of emerging policies and approaches given the breadth of their interactions with Commissioners and new issues. As Cascade strives to implement best planning practices, as depicted in Box #2, stakeholders can provide advice based on what they've seen in the industry.



The Company has and will continue to encourage stakeholder feedback, questions, and suggestions to assist Cascade in producing an IRP that meets the regulatory requirements and Cascade’s customers’ needs. Cascade prefers to receive feedback as early as possible in the process (e.g., in the course of its technical advisory group meetings or soon thereafter) so that the Company has a better opportunity to address questions or analyze/apply more stakeholder suggestions. Cascade recognizes that all parties are extremely busy, but strongly believes that stakeholder participation is crucial from the outset.

### **Box #2: From WUTC 6/18/18 Workshop**



The above recognizes that key analytical components of the IRP—such as the demand forecast—need to be “locked down” at least midway through the process so that resource integration can be addressed. Interested parties can best influence these components earlier, rather than later, in the process.

## **Conclusion**

While Cascade "owns" and is responsible for the IRP, the Company desires to have involvement from stakeholders to provide a diversity of perspectives. A best practices IRP is informed by perspectives, analyses and access to concerns and approaches that the Company may not have considered. Some stakeholders participate in multiple IRP processes and have a line-of-sight that may not be available to Cascade, despite the Company monitoring other utilities’ IRPs and associated processes.

Cascade recognizes parties will submit sometimes-detailed comments at the conclusion of the stakeholder involvement process in advance of Commission acknowledgement. The Company’s hope is that the guidelines contained in this Document will allow stakeholders to demonstrate to the Commission their work in the final IRP while concurring with its conclusions given the parties’ influence.