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August 18, 2023

Oregon Public Utility Commission
Attn: Filing Center
201 High Street S.E., Suite 100
Salem, OR 97301-3398

**Re: ADV 1531, Advice No. O23-07-05, Oregon Low-Income Energy Conservation
Supplemental Filing**

On July 28, 2023, Cascade Natural Gas Corporation (Cascade or Company) filed Advice No. O23-07-05, docketed as ADV 1531, to revise Schedule 33, Oregon Low-Income Energy Conservation. The Company now supplements the subject filing with the following replacement sheets, stated to become effective with service on and after October 1, 2023:

First Revision of Sheet No. 33.1
First Revision of Sheet No. 33.2
Second Revision of Sheet No. 33.3

Second Revision of Sheet No. 33.4
Second Revision of Sheet No. 33.5

All other sheets submitted in the subject filing remain as filed.

The purpose of this supplemental filing is to add minor clarifying or corrective text as discussed with Commission Staff.

If you have any questions regarding this filing, please contact Mike Parvinen at (208) 734-4593.

Sincerely,

/s/ Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
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Attachment

**SCHEDULE 33
OREGON LOW-INCOME ENERGY CONSERVATION PROGRAM**

PURPOSE

The purpose of this provision is to define the terms and conditions under which that portion of the funds designated for use for low-income weatherization programs under Schedule 31, Public Purpose Charge will be administered and delivered to eligible customers.

AVAILABLE

This program is available to residential customers who meet the definition of low-income as defined by the Federal Low Income Home Energy Assistance Program (LIHEAP) and who reside in dwellings where the primary heating equipment is fueled by natural gas.

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PROGRAM DESCRIPTION

The Oregon Low-Income Energy Conservation (OLIEC) Program is a program designed to make qualifying low-income households within Cascade’s service territory more energy efficient by providing rebates for the installation of certain weatherization and conservation measures following the completion of a home energy evaluation performed by qualifying low-income Community Action Agencies, 501(c)3 non-profit agencies, or Community Based Organizations (CBOs) (referred to collectively as Agencies).

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ENERGY EFFICIENCY MEASURES

The following energy efficiency measures qualify for rebates under this program:

Existing Low-Income Residential Dwellings

Qualifying measures include but are not limited to the following weatherization measures and high efficiency, natural gas-fired appliances:

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- Ceiling insulation
- Wall insulation
- Floor insulation
- Water heater insulation
- Duct sealing
- Duct insulation
- Infiltration reduction
- Low-flow faucet aerators
- Low-flow showerheads
- Natural gas furnaces
- Furnace tune-up and filter replacement
- Direct vent space heater
- Natural gas water heaters (including tankless)

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New Low-Income Residential Construction

The following energy efficiency measures qualify for rebate when installed in new construction designated primarily for the habitation of low-income individuals for at least a thirty-year period. Qualified measures include but are not limited to the following:

- Energy Star® Qualified Homes
- High-efficiency furnace installations where cost effective
- High-efficiency water heater

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SCHEDULE 33
OREGON LOW-INCOME ENERGY CONSERVATION PROGRAM

PROGRAM YEAR

The OLIEC Program year will extend from October 1 through September 30.

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CUSTOMER QUALIFICATIONS

All funds collected under this program will be distributed only to qualifying income-eligible residential customers of Cascade. In the event the Company receives a rebate request for a single customer from two or more Agencies, the Company will process only one rebate request.

FUNDING AVAILABILITY

1. The Company will distribute funds to Agencies on a first-come, first-serve basis.
2. Any amounts not disbursed in the program year will carry over to the next program year.
3. The program will be managed such that expenditures will not exceed the annual budget of 0.625% of the Company's gross revenues. If program funding is insufficient for program demand, the program offerings may not be available for a portion of the year.

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(M) refers to text previously on Sheet No. 33.3

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SCHEDULE 33
OREGON LOW-INCOME ENERGY CONSERVATION PROGRAM

AGENCY QUALIFICATIONS AND RESPONSIBILITIES

1. For the purpose of this Schedule, an Agency is a Community Action Agency, a 501(c)3, or a CBO that meets the following qualifications. In order to participate in the program, an Agency must be a legal entity, contracting or subcontracting with OHCS, as an administrator of LIHEAP. An agency shall also qualify to participate in the program if it is a state-recognized Low-Income Agency, 501(c)3 nonprofit, or CBO engaged in the construction or retrofit of affordable housing designated primarily for the habitation of low-income individuals. Each participating Agency must also have an up to date, signed Memorandum of Understanding with Cascade Natural Gas.
2. Each participating Agency will have sole responsibility to screen and approve applicants for eligibility. Each Agency shall follow the established protocols for the qualification of and disbursement to eligible participants in accordance with the guidelines promulgated by OHCS. Agencies operating the Weatherization Assistance Program shall complete their work in accordance with the Low-Income Energy Assistance Act of 1981 and subsequent amendments, as outlined in the OHCS Omnibus Contract. The Company reserves the right to verify installation and compliance with all state codes and standards prior to payment of any rebates.
3. Each participating Agency shall be responsible to complete and return to the Company all required paperwork and other documentation as may be necessary for the Company to process the rebate request. The Company will provide the documentation forms to each participating Agency in electronic or hardcopy form, whichever is requested. At a minimum, the documentation must include the Agency name; customer name; the landlord name and address, if applicable; the address of the qualifying households; the square footage of the home; a list of the measures installed; documentation that the measure qualifies (per REM Rate documentation, DOE Priority List, or Deemed Measures Priority List) as established in the Rebate Payments section of this schedule; the rebate amount per measure; total rebate per household; and a statement on whether or not all eligible measures were installed at the dwelling.

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REBATE PAYMENTS

1. The Company will reimburse participating Agencies for the installation of qualifying measures installed in each eligible household.
2. In no event will any rebate amount be greater than the actual installed cost of the measure.

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(K) refers to text that is moved to Sheet No. 33.2.

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SCHEDULE 33
OREGON LOW-INCOME ENERGY CONSERVATION PROGRAM

REBATE PAYMENTS (continued)

- 3. Qualified measures are eligible for rebates in the amount 100% of the installed cost of the measure. (C)

- 4. These measures will qualify for a rebate payment to the Agencies when at least one of the following criterion is met: (a) the measures are identified as cost effective under the Department of Energy (DOE) Priority List; (b) the measures are identified as cost effective under the Deemed Measure Priority List (DMPL); or (c) each measure is identified as having a savings-to-investment ratio (SIR) of 1.0 or higher according to the Agency energy audit of the dwelling in which the measure is being installed. Participating Agencies may use REM-Rate energy modeling software when conducting audits to demonstrate an SIR of 1.0 or higher for each individual measure. Agencies must provide a copy of the DOE Priority List, DMPL or REM-Rate report along with its complete rebate application and other supporting documents as specified on the Company’s current rebate application form in order to qualify for incentives. (C)
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PROGRAM ADMINISTRATION AND DELIVERY COSTS

- 1. Agencies will be provided reimbursement for actual project costs for homes served under the OLIEC Program. Expenses associated with project coordination will be funded up to maximum program average of 20 percent of the total project cost as billed to the Company. An additional agency indirect rate associated with the delivery of low-income conservation measures will be provided in the amount of 10 percent of the total project cost as billed to the Company. Funds will be reimbursed from the Low-Income Weatherization account. Reimbursement for project coordination and indirect rate is not to exceed 30 percent of the total project cost as billed to the Company. The Company will process rebates and Agency payments within thirty days from the date the Company receives all completed documentation in support of such rebate requests. (C)

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**SCHEDULE 33
OREGON LOW-INCOME ENERGY CONSERVATION PROGRAM**

PROGRAM ADMINISTRATION AND DELIVERY COSTS (continued)

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2. The Company will be reimbursed each month for actual program administration costs incurred, except that such reimbursement will not exceed 5% of the total available funds collected during each program year.

ADVISORY GROUP

An Advisory Group will assist the Company in low-income weatherization development, implementation, and evaluation. The Advisory Group will consist of at least one member each from the Company, Commission staff, Community Action Partnership of Oregon (CAPO) and two or more participating Agencies.

ANNUAL REPORT

By December 1 of each year, the Company will submit an annual report to the Commission containing the following information:

- **General:** 1) Program successes and barriers (if any) to implementation; 2) Associated Program outreach activities.
- **Economic:** 1) Revenue balance from previous year; 2) Program revenue; 3) Accrued interest; 4) Total available funds; 5) Total expenditure of OLIEC funds; 6) Total OLIEC costs allocated by measure; 7) the Company's administrative costs; 8) Funding allocations or changes within the program year; 9) Payments to Agencies for weatherization measures, administration, and program delivery; 10) Average rebate allocated per home served;
- **Agency Performance:** 1) percentage of homes served per Agency for the program year; 2) Total number of homes served;
- **Program Results:** 1) Total deemed therm savings attributable to the OLIEC program by year; 2) Total number of measures installed in all homes served during the program year; 3) Average number of measures installed per home; 4) Number of measures installed by type; 5) Number of each allowable measure installed in total during the program year; 6) Total therm savings by measure; 7) Number of multifamily dwellings treated and observations made about multifamily projects.
- **General:** 1) A breakdown of the number of homes served by town and agency. The Company will identify factors that account for the volume of homes served by region; 2) The Company will monitor rebate turn-around time

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