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January 24, 2024

Jeff Killip
Executive Director and Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

RE: NEW, Advice No. 24-01-02

Schedule 301, Low-income Weatherization Incentive Program

Director Killip

Cascade Natural Gas Corporation ("Cascade" or "Company") submits to the Washington Utilities and Transportation Commission ("Commission") the following revisions to its Tariff WN U-3, stated to become effective with service on and after March 1, 2025:

Eighth Revision of Sheet No. 301 Sixth Revision of Sheet No. 301-A Third Revision of Sheet No. 301-B

The purpose of this filing is to revise Schedule 301, Low-Income Weatherization Incentive Program, to commence a one-year pilot, where third-party weatherization contractors would be allowed to administer unprocessed leads for Cascade's Low-Income Weatherization Incentive Program ("WIP"). Community Action Agencies ("Agencies") will continue to be the primary program administrators, holding the first right of refusal of any customer lead. Agency work and involvement with WIP is valued, and this pilot will not diminish their role or renumeration for program administration. This pilot is being proposed as a means to address the influx of program referrals the Company has received from its Cascade Arrearage Relief and Energy Savings ("CARES") low-income bill assistance program.

The CARES program, which launched October 1, 2023, has greatly increased the Company's reach to income-qualified customers. CARES applications ask customers if they are interested in learning more about the weatherization services offered through WIP. Approximately 800 customers have responded affirmatively, uncovering a distributional inequity among income-qualified customers who would like access to energy saving opportunities. Agencies administering WIP do not currently have the capacity to respond to these customers, as the number of referrals received in less than a year (~800) greatly exceeds the number of homes Agencies have been able to weatherize in the past five years (297). The discrepancy between the need for income-qualified weatherization services and the current capacity to serve the need cannot be simply fixed by enhancing the current delivery model. Over the past few years, WIP has been removing program and funding barriers in an effort to increase program reach. While efforts have been successful, the impact has

not been significant enough. The proposed pilot program will seek to identify a means to meet customers' need for WIP services and to understand potential barriers or bottlenecks to traditional WIP delivery. Cascade is anxious to connect more customers with weatherization services, as weatherizing a home is the most enduring means to lowering energy bills and to making a home more comfortable. Weatherization is also an effective method to lower the overall carbon emissions of the Company's distribution system.

The pilot parameters are outlined in the attached document titled, "NEW-W25-01-02-CNGC-WIP-Pilot-Plan-01-24-2025.pdf." This document is the product of the following communications with Agencies and other interested parties, including customer representatives from vulnerable populations, Commission Staff, The Energy Project ("TEP"), and the Washington State Department of Commerce:

September 9. 2024: Discussed the unmet need related to WIP referrals with Cascade's

Equity Advisory Group

September 10, 2024: Draft pilot plan provided to all CAG members (TEP, Commission Staff,

and Dept of Commerce)

September 17, 2024: Meeting on pilot plan with TEP
September 26, 2024: Received written comments from TEP

September 27, 2024: Meeting with Commission Staff and Department of Commerce to

discuss draft pilot plan, which was significantly revised as a result of

this meeting.

October 2, 2024: Emailed a draft tariff filing including the revised WIP pilot plan to

Agencies, Commission Staff, and TEP.

October 11, 2024: Presented WIP pilot plan to the Equity Advisory Group

October 23, 2024: Meeting with Agencies, Staff, TEP, and Dept. of Commerce on the

revised WIP pilot plan.

December 12, 2024: Cascade met with TEP to discuss the WIP pilot

The discussions about the pilot and the multiple rounds of drafts demonstrate Cascade's commitment to balancing the need to ensure qualifying customers have timely access to WIP services with its desire to ensure the Agencies' long-term success.

Cascade's Equity Advisory Group favors the proposed WIP pilot program, noting that customers seeking weatherization should reasonably expect to wait up to thirty days to be contacted but longer than that is poor service. Currently, the approximately 800 referrals in the WIP queue that have been accumulating since October 1, 2023, have received no call back for WIP services. Equity Advisory Group members, who have lived experience as vulnerable and/or low-income, report experiencing difficulty connecting with or making appointments with Agencies, citing that Agencies are small organizations that appear to be too understaffed to serve all the needs within their communities.

Parties to the Conservation Advisory Group, which include TEP, Agencies, and Commission Staff, have mixed opinions about the WIP pilot. Cascade is not confident it can say TEP or Agencies are fully opposed or in favor of the pilot as the overall tenor has been apprehensive that the pilot could result in a competing service delivery arm or in poorly treated homes. Cascade has heard these concerns and this is why Cascade is proposing a one-year pilot where contractors will be subject to the same requirements as Agencies and will be expected to do the same quality and breadth of work. After one year, the pilot will be evaluated against the program standards and parties' concerns. Commission Staff has been supportive of the WIP pilot

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Schedule 301, Low-Income Weatherization Incentive Program

program, recognizing that the distributional inequity of not serving customers with a need for income qualified weatherization services cannot be ignored.

Overall, Cascade looks forward to implementing the WIP pilot in order to bring weatherization services to customers who both need it and want it.

This electronic filing consists of the following files:

- NEW-W25-01-02-CNGC-WIP-CLtr-01-24-2024.pdf
- NEW-W25-01-02-CNGC-WIP-Trf-01-24-2024.pdf
- NEW- W25-01-02-CNGC-WIP-Pilot-Plan-01-24-2024.pdf

Please direct any questions regarding this filing to me at (208) 377-6015 or Jennifer Gross at (509)-975-9473.

Sincerely,

/s/ Lori Blattner

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Attachments

WN U-3

SCHEDULE 301 LOW-INCOME WEATHERIZATION INCENTIVE PROGRAM

AVAILABILITY

This program is available to qualifying low-income customers receiving residential gas service.

PROGRAM ADMINISTRATION

The program will be administered by Department of Commerce-approved, Low -Income Weatherization providers and other Low Income Agencies providing weatherization services (Agencies). Also, for 12-months beginning March 1, 2025, Cascade will pilot the use of third-party weatherization service contractors as program administrators to provide Low-Income Weatherization Incentive Program (WIP) services as defined in this schedule. Hereafter, any WIP administrator is referred to as a Program Administrator.

(N)

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PROGRAM DESCRIPTION

This program is designed to increase energy efficiency in low-income households within Cascade's service territory by providing rebates for the installation of approved energy efficiency measures in qualifying residential customers' dwellings following the completion of a home energy evaluation performed by a Program Administrator.

(C)

ELIGIBILITY

In order to qualify for WIP rebates, a Program Administrator must certify that the customer is income qualified, defined as residing in a household with a 200% federal poverty level (FPL) or less, and that the customer's household uses natural gas as its primary heat source.

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WIP REBATES

WIP rebates shall fully fund the cost of qualified weatherization measures for customers. "Fully funded" does not prohibit the Program Administrator from leveraging other funding sources in combination with Cascade-provided funds to pay for low-income conservation projects.

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ENERGY EFFICIENCY MEASURES

The following high efficiency measures qualify for rebate under WIP:

- 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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(D)

CNG/W25-01-02 Issued January 24, 2025 Effective for Service on and after March 1, 2025

Issued by CASCADE NATURAL GAS CORPORATION

By: Clai AB latt

Lori Blattner Director, Regulatory Affairs

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SCHEDULE 301 LOW-INCOME WEATHERIZATION INCENTIVE PROGRAM

ENERGY EFFICIENCY MEASURES (continued)

These measures will qualify for a rebate payment when one of the following is true:

- (a) The measures are identified as cost-effective under the appropriate climate zone and housing type under the Washington State Department of Commerce Deemed Measure Priority List (DMPL);
- (b) The measures are identified as cost-effective under the Department of Energy (DOE) Priority List; or
- (c) Each measure is identified as having a savings-to-investment ratio of 1.0 or higher according to the Program Administrator's energy audit in the dwelling in which the measure is being installed.

Participating Program Administrators shall use the energy modeling software, TREAT; DMPL; or the DOE Priority List when conducting audits. Program Administrators shall provide a copy of the TREAT or the Priority List report along with its completed rebate application, and other documentation, as specified on the Company's current rebate application form, in order to qualify for incentives. The Company may consider exemptions to the 1.0 SIR requirement for individual measures, if such exemptions are consistent with provisions in the Department of Commerce Weatherization Manual, and the total weatherization project remains cost-effective. Such exemptions must be approved on an individual basis by the Company and its Conservation Advisory Group. Only Program Administers with a demonstrated 12-month history of projects whose final costs have not exceeded 120% of anticipated costs shall be eligible for this exemption.

REBATE CALCULATION

Cascade will provide a WIP rebate to the Program Administrator for the total installed cost of approved weatherization measures. Installed cost shall include associated repair work, and health and safety improvements necessary for the installation of a qualified measure, provided advanced review and approval is provided to the Company prior to payment. The Program Administrator shall demonstrate total install costs by providing the Company with all requisite documentation including contractor invoices, where available, or an otherwise itemized list of the work performed and costs incurred.

ADMINISTRATIVE FEES (C)

Agencies will be reimbursed for project coordination. Project coordination will be funded up to a maximum program average of 30 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. The Company will pay Agencies the total combined project coordination and indirect rate of up to 40% of the total project cost as billed to the Company.

Third-party weatherization contractors will be reimbursed for 100 percent of their material costs and labor costs as invoiced to Cascade. (N)

(continued)

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By: & Blattner Director, Regulatory Affairs

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SCHEDULE 301 LOW INCOME WEATHERIZATION INCENTIVE PROGRAM

GENERAL PROVISIONS:

- The low-income weatherization program costs will be accounted for and recovered through an
 annual deferral amortization or other accounting mechanism as required under the most recent
 conditions of the Company's Biennial Conservation Plan. Cascade shall retain existing cost recovery
 mechanisms, subject to the Commission's Order in Docket UG-152286, unless otherwise ordered by
 the Commission.
- 2. All installations of weatherization must comply with all codes and permit requirements applicable in the state of Washington and must be properly inspected, if required, by a designated quality assurance inspector.
- 3. The Company reserves the right to verify installation prior to payment of any rebates. Rebates are qualified for payment under the terms of the most recent rebate application form, which are subject to update.
- 4. Cascade, in conjunction with its Conservation Advisory group, and the Program Administrators that deliver the low-income weatherization program, will develop and report annual savings goals based on projected annual completions.
- 5. Program spending will be monitored by the Company in conjunction with the CAG to ensure that proper fiscal management is taking place by those delivering the program. To the extent possible, these activities will be integrated with Cascade's existing biennial and annual conservation planning and reporting processes.
- 6. A Program Administrator must have a current, signed Memorandum of Understanding with Cascade with individualized targets for the number of homes anticipated to be served by that Agency for the calendar year. This target shall be developed in coordination with the Agency and shall be adjusted on an annual basis.

Program Administration Pilot Terms and Conditions

- 1. The Program Administration Pilot will conform to the parameters put forth in the WIP Pilot Plan filed as an attachment to Advice No. 25-01-02.
- 2. Cascade will pilot the use of third-party contractors to administer WIP referrals that exceed the Agencies' workload capacity. Agencies will have the first right of refusal of any customer lead received.

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By: Clai AB Lori Blattner

Director, Regulatory Affairs



Introduction

On October 1, 2023, Cascade Natural Gas Corporation ("Cascade" or "Company") launched its Cascade Arrearage Relief and Energy Savings ("CARES") low-income bill assistance program. The CARES program has greatly increased the Company's reach to income-qualified customers. CARES applications ask customers if they are interested in learning more about the weatherization services offered through the Weatherization Incentive Program ("WIP"). Numerous customers have responded affirmatively, uncovering a distributional inequity among income-qualified customers who would like access to energy saving opportunities. Cascade's WIP does not have currently have the capacity to respond to the customers referred from CARES. Cascade in collaboration with its Conservation Advisory Group ("CAG") has developed the pilot program put forth in this document as a means to provide WIP services to the influx of program leads received from CARES enrollments.

Pilot Overview

Cascade seeks to allow third-party weatherization contractors to administer unprocessed leads for WIP. Community Action Agencies ("Agencies") will continue to be the primary program administrators, holding the first right of refusal of any customer lead. Refusal has been granted if an Agency has directly stated it either verbally or electronically, if the Agency has not responded within 30 days of receipt of a WIP lead, or if the number of WIP referrals is 300% above the agency's capacity as estimated for the current calendar year. Agency work and involvement with WIP is valued and this pilot will not diminish their role or renumeration for program administration.

<u>Term</u>

The term of this pilot will be March 1, 2025, through February 28, 2026. Extension of the pilot thereafter will require a conversation with Cascade's CAG and a tariff filing with the Washington Utilities and Transportation Commission ("Commission").

Third-Party Contractors

Cascade will engage with third-party contractors that provide weatherization services within the Company's service territory. Cascade would like to keep the parameters regarding how to find, engage, and qualify third-party contractors loosely defined to allow the Company to adapt to learnings within the marketplace. The Washington State Department of Commerce has rightly noted that Cascade is likely to experience the same market limitations for third-party contractors that it experiences and so for this pilot to be successful, Cascade needs the parameters to allow for adaptation. Ideal third-party contractor candidates should have knowledge of and interest in working with vulnerable and high-barrier populations; a desire to coordinate with existing Agencies' administrators as needed to provide customers with wrap-around services; and should not hold a current contract as an Agency subcontractor for income-qualified weatherization services.

First Right of Refusal

The goal of this program is to engage third-party contractors in the provision of WIP services for the excess referrals the Company is receiving through CARES. Cascade is not looking to replace or supplant the Agencies. The Agencies will have first right of refusal of all customer leads and will experience no punitive change in renumeration due to this pilot program. Refusal has been granted if the Agency has directly stated it either verbally or electronically, if the Agency has not responded within 30 days of receipt of a WIP lead, or if the number of WIP referrals is 300% above the agency's capacity as estimated for current calendar year. Agencies will be able to work to their capacity (actual, not estimated), and third-party contractors will perform work exceeding Community Action Agencies' capacity.

Third-Party Contractor Requirements

Third-party contractors providing WIP services will be subject to all the terms and conditions established in Schedule 301 for Program Administrators, including the following. All program administers must:

- Only proceed with a project if the customer is income qualified, defined as residing in a household with a 200% Federal Poverty Level ("FPL") or less
- Perform an energy audit on the household to identify the cost-effective, high-efficiency measures that need to be installed in the household
- Perform any needed health and safety repairs to the qualified customer's home as necessary to
 ensure the installed weatherization measures are effective in saving energy (e.g.- repair holes in
 walls, doors, etc.)
- Install all qualifying high efficiency energy efficiency measures as listed as Attachment A, with the exception of air-sealing which, if the Agencies choose, will be the exclusive domain of Agencies. The "whole home" approach to WIP services is to be upheld throughout this program such that the quality and breadth of work a customer receives from a third-party contractor is not of lesser quality or breadth (with the exception of air sealing which may by choice be the Agencies' exclusive domain) than the work a customer would have received from an Agency.
- Provide the Company with paperwork demonstrating that all installed measures are costeffective per the Department of Energy Deemed Measures Priority List
- Provide the Company with all job invoices
- Have a current signed Memorandum of Understanding with the Company
- Agree that a separate third-party contractor may inspect up to five percent of the completed projects for quality-control

Qualifying Customers for WIP

Since third-party contractors administering WIP will not be using state or federal funding and, therefore, will not be subject to the requirements tied to that funding, this pilot can consider the potential barriers to entry to WIP. For this pilot, a customer served by a third-party contractor will be considered income qualified with no additional paperwork or process if the customer has received a Low-Income Home Energy Program ("LIHEAP") grant or has been income-verified by an Agency for the CARES program within the past 24 months. Cascade may also verify income using the same means deemed appropriate by CARES Advisory Group for the CARES income verification process, which may include additional opportunities for categorical eligibility or the acceptance of income documentation that is not standard for LIHEAP.

Third-Party Renumeration

Third-party contractors will be paid 100% of the invoice costs for all jobs that conform to the WIP requirements as established in Schedule 301.

Air Sealing

Air sealing may be the exclusive domain of the Agencies, if desired. However, each Agency may waive their right to perform air-sealing on a project-by-project basis, either through direct verbal or electronic communication with Cascade or the third-party contractor, or by inaction extending 60 days after the third-party contractor has completed installing all other measures for the project. When an Agency has not waived its right to install air-sealing, a third-party contractor will consider their role in the whole-home weatherization project complete when all qualifying measures, except air-sealing, are installed. The Agencies will follow up with the customer to perform air sealing. This provision will allow Agencies to observe the completed third-party work, to have a touchpoint with customers thereby having an opportunity to refer customers to other state and federal programs, when appropriate, and ensuring that the air sealing is finished properly. When an Agency waives the right to perform air-sealing, the third-party contractor may finish installing all measures for the project.

Funding Limitations

As stated in Schedule 301, Cascade will monitor program spending and provide the CAG with spending updates to ensure that the program retains proper oversight of its budget. If program year spending doubles by 100 percent over the prior year, Cascade and the CAG will discuss if the pilot should be halted or if spending limitations should be imposed for the remainder of the pilot year.

Potential Options

As mentioned under the Third-Party Contractor header, Cascade may experience issues securing contractors. In the event this occurs, Cascade would like the pilot to have the flexibility to conform the provision of services such that third-party contractors install weatherization measures and Agencies perform income certification for applicants and/or quality assurance audits. If needed, Cascade would pay the Agency for either or both task(s) on a per job basis, and acceptance of such work would be at the discretion of the Agency. This would be a fallback provision if the third-party contractors are either unavailable or are struggling to complete WIP jobs.

Benchmarks of Success

The pilot program will be considered successful if third-party contractors serve any number of customers from the Company's WIP & CARES referral lists with whole-home weatherization. This pilot seeks to extend the reach of WIP without supplanting the baseline work performed by Agencies. Upon completion of the pilot, the Company will discuss the pilot, including outcomes and additional learnings, in its 2026 Annual Report.

ATTACHMENT A – MEASURES

ADMINISTRATIVE PROJECT FEES	
	MEASURE ASSOCIATION
Prime Contractor Intent & Affidavit (Single job)	ASSIGN TO THE GREATEST COST MEASURE
Lead Renovator Requirements	ON PROJECT, or if it's LEAD, place it in the measure(s)
Job Travel and Housing Cost	illeasure(s)

ATTIC AND CEILING WEATHERIZATION	
	MEASURE ASSOCIATION
ATTIC-Cellulose Blow	CEILING AND/OR ATTIC INSULATION
ATTIC-Fiberglass Blow	
ATTIC Fiberglass Unfaced Batt	
ATTIC-Fiberglass Kraft Batt	
Closed Cavity Insulation	
MOBILE-Blow Through Gable Ends	
MOBILE-Blow Attic Cavity Through	
Roofing	
MOBILE - EPDM and R-19 Foam Board	
MOBILE - EPDM, Fiberglass Blow Cavity	
Full F. EDDM Only	
MOBILE - EPDM Only	
Repair Primary Roof Leaks	
Install New Attic Access	
Repair Attic Access Framing and Lid	
Insulate Attic Access Lid	
Repair Staircase Coffin Attic Access	
Access Lead Safe Work Practices	
New Gable Vent	
New Roof Vent	
New Soffit or Eave Vent	
Rescreen Existing Vents	
Vent Lead Safe Work Practices	
Extend Bath Fan	
Install Bath Fan Damper	
Extend Kitchen Fan	
Install Kitchen Fan Damper	
Install Kitchen Hood or Ceiling Fan	
Install New Motion Detector Bath Fan	
Install New Bath Fan	
Knob & Tube Inspection	
Knob & Tube Replacement	
J-Box Electrical Splice	
Electrical Permit RE: Attic / Ceiling	

Attic/Ceiling Lead Safe Work Practices	
Fan Install Lead Safe Work	

WALL INSULATION	
	MEASURE ASSOCIATION
Dense Pack Closed Wall Exterior Blow	
Wall Blow Lead Safe Work	
Wall Batt Insulation	
Wall Tyvek/FSK Approved Cover	
Install New Knee Wall Access	WALL INSULATION
Repair Knee Wall Access Framing and Lid	
Insulate Knee Wall Access Lid	
Knee Wall Access Lead Safe Work	
Practices	

FLOOR INSULATION	
	MEASURE ASSOCIATION
6 mil Ground Cover	
Floor Wrap Water Pipes	
Floor Repair to accommodate Insulation	
Floor Insulation	
Floor Tyvek/FSK Approved Cover	
Interior Perimeter Insulation	
Install New Crawlspace Access	
Repair Crawlspace Access	
Insulate Crawlspace Access	
Add Metal Area Well to Exterior Crawl Access	FLOOR INSULATION
Plumbing Repair	
Mobile Floor - Blow Cavity Full	
Mobile Floor - Repair Belly Paper	
Protect Existing Cross-Over Duct	
Replace, Seal, Insulate Cross-Over Duct	
Install Blue/Pink Board under Cross-Over	
Rescreen Existing Foundation Vents	
Closed Cavity Insulation	

DUCT INSULATION	
	MEASURE ASSOCIATION
Duct Insulation - LINEAL FEET INSTALLED	DUCT INSULATION

WATER HEATER INSULATION	
	MEASURE ASSOCIATION
Water Heater Wrap Insulation	WATER HEATER INSULATION

First Six (6) feet StorageTank Water Pipe(s)	
Insulate Water Heater Closet Door	

FURNACE TUNE UP AND FILTER REPLACEMENT	
	MEASURE ASSOCIATION
Furnace Tune Up/Maintenance	FURNACE TUNE-UP AND FILTER
Filter Replacement	REPLACEMENT

DUCT SEALING	
	MEASURE ASSOCIATION
Repair/Replace Duct Work	DUCT SEALING
Seal Duct Work	DUCT SEALING

INFILTRATION	
	MEASURE ASSOCIATION
Door Weatherstrip Installation	
Door Threshold & Shoe	
Door Shoe Only	
Door Sweep	
Weatherstrip Lead Safe Work	
Small Window Pane Glass Repair	
Install Prehung Exterior Insulated Door	
Clothes Dryer Duct Extension	
Undercut Interior Door	INFILTRATION
Room to Room Bypass Grill	INFILIRATION
MVL Test & Report	
CAZ Test & Report	
CAZ Repair	
Blower Door Assisted Air Sealing	
Prescriptive Air Sealing Reduction	
Seal Vertical or Horizontal Attic Bypass	
Smoke Detector	
CO Detector	

95%+ FURNACE INSTALL	
	MEASURE ASSOCIATION
Programmable Thermostat with Furnace	
Venting for Furnace	95%+ FURNACE
Furnace Replacement	

90%+ DIRECT VENT SPACE HEATER	
	MEASURE ASSOCIATION
Direct Vent Space Heater Install	90%+ DIRECT VENT SPACE HEATER
Programmable Thermostat with DV Heater	

Venting for DV Space Heater	
Direct Vent Space Heater Replacement	

LOW FLOW FAUCET AERATOR	
	MEASURE ASSOCIATION
Low Flow Faucet Aerator	LOW FLOW FAUCET AERATOR

LOW FLOW SHOWERHEAD	
	MEASURE ASSOCIATION
Low Flow Showerhead	LOW FLOW SHOWERHEAD

0.91+ TANKLESS WATER HEATER	
	MEASURE ASSOCIATION
0.91+UEF Tankless Water Heater	0.91+ TANKLESS WATER HEATER
Venting Tankless Water Heater	U.91+ TAINNLESS WATER HEATER

0.64+ STORAGE WATER HEATER	
	MEASURE ASSOCIATION
0.64+ Storage Water Heater	O CAL STORAGE WATER HEATER
Venting Storage Water Heater	0.64+ STORAGE WATER HEATER