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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

Table of Contents

[I. Introduction 1](#_Toc470782856)

[II. Purpose 1](#_Toc470782857)

[III. Principles 1](#_Toc470782858)

[IV. Context 2](#_Toc470782859)

[V. Mutual Expectations 2](#_Toc470782859)

[VI. Desired End-Result 3](#_Toc470782861)

VII. Conclusion ……………………………………………………………………….………………………………………………………….….4

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

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.

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



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.

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.