

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS  
CORPORATION,

Respondent.

**DOCKET UG-260127**

**CASCADE NATURAL GAS CORPORATION**

**DIRECT TESTIMONY OF NOEMI ORTIZ**

**May 29, 2026**

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## **LIST OF EXHIBITS**

<b><u>Exhibit</u></b>	<b><u>Description</u></b>
Exh. NO-2	Direct Testimony of Noemi Ortiz, UG-240008
Exh. NO-3	2025 EAG Meeting Agendas
Exh. NO-4	MYRP EAG Topic Schedule Presentation
Exh. NO-5	Vendor Selection Presentation
Exh. NO-6	MDU Resources Supplier Tracking Sheet
Exh. NO-7	EAG Member Solicitation Email
Exh. NO-8	IIJA-IRA Presentation
Exh. NO-9	Advisory Group Agendas and Rate Case Presentation

1 I. INTRODUCTION

2 Q. Please state your name and business address.

3 A. My name is Noemi Ortiz. My business address is 8113 West Grandridge Boulevard,  
4 Kennewick, Washington, 99336.

5 Q. By whom are you employed and in what capacity?

6 A. I am employed by the Cascade Natural Gas Corporation (“Cascade” or “Company”).  
7 I am the Manager of Energy Efficiency Programs.

8 Q. How long has Cascade employed you?

9 A. I have been employed by Cascade since July 18, 2022.

10 Q. What are your duties as Manager of Energy Efficiency Programs?

11 A. I am responsible for the Company’s equity initiatives including establishing the  
12 Company’s Equity Advisory Group (“EAG”), facilitating EAG meetings, and  
13 managing relationships with EAG members, which means communicating with them,  
14 compensating them for their time, and ensuring the Company responds to their  
15 questions and concerns. I also manage Cascade’s low-income conservation programs  
16 in Washington and Oregon, which includes overseeing program administration,  
17 implementation, and outreach, as well as the Company’s engagement with both the  
18 Washington and Oregon Conservation Advisory Groups, and the Cascade Arrearage  
19 Relief and Energy Savings (“CARES”) and Oregon Low-Income advisory groups. My  
20 responsibilities also include oversight of the Company’s voluntary renewable natural  
21 gas (“RNG”) programs in Washington and Oregon.

22 Q. Briefly describe your educational and relevant employment experience.

23 A. I hold a bachelor’s degree in law and justice from Central Washington University, and  
24 I am one semester from having a Master of Business Administration from Western



1 **Q. Do you sponsor any exhibits in support of your recommendations?**

2 A. Yes, I sponsor the following exhibits in support of my testimony:

- 3 • Exh. NO-2 Direct Testimony of Noemi Ortiz, UG-240008
- 4 • Exh. NO-3 2025 EAG Meeting Agendas
- 5 • Exh. NO-4 MYRP EAG Topic Schedule Presentation
- 6 • Exh. NO-5 Vendor Selection Presentation
- 7 • Exh. NO-6 MDU Resources Supplier Tracking Sheet
- 8 • Exh. NO-7 EAG Member Solicitation Email
- 9 • Exh. NO-8 IJJA-IRA Presentation
- 10 • Exh. NO-9 Advisory Group Agendas and Rate Case Presentation

11 **III. EQUITY ADVISORY GROUP**

12 **Q. What is the function of the Equity Advisory Group?**

13 A. The EAG is a collaborative forum comprised of seven members of the community who  
14 provide customer representation from highly impacted communities, marginalized  
15 populations, low-income communities, and racial minorities such as tribal members  
16 and black, indigenous, and people of color. The group was formed to bring under-  
17 represented community members into Cascade’s decision-making process so that the  
18 needs of and the distribution of benefits to disenfranchised and vulnerable communities  
19 would be thoughtfully considered. A detailed description of how the EAG was formed  
20 and an overview of its early discussions were provided in my Direct Testimony filed  
21 in Docket UG-240008, attached as Exhibit NO-2.

1 **Q. Explain the frequency and typical content of an EAG meeting.**

2 A. The EAG meets via video conference on a monthly basis. During the meetings, the  
3 EAG discusses a broad range of topics related to Cascade’s programs, services,  
4 planning and business practices that have both direct and indirect impacts on Cascade’s  
5 vulnerable customers. Commission Staff and Public Counsel attend Cascade’s EAG  
6 meetings in observatory roles rather than as regulatory overseers of the Company’s  
7 decisions and operations. Cascade is mindful of monitoring the EAG dynamic for  
8 power imbalances that would make its members uncomfortable or less vocal.

9 **Q. What requirements related to the EAG were adopted in Cascade’s most recent**  
10 **MYRP?**

11 A. Paragraph 26 in Appendix A to the Final Order identifies the following seven topics  
12 Cascade committed to discuss with its EAG:<sup>2</sup>

- 13 1. Vendor selection;
- 14 2. Soliciting representation from all fourteen vulnerable populations (and  
15 discussion as to whether the list is still accurate);
- 16 3. EAG meeting logistics;
- 17 4. Commission Policy Statement in Docket No. U-240013 and [Inflation  
18 Reduction Act (“IRA”)/Infrastructure Investment and Jobs Act (“IIJA”)]  
19 funding opportunities;
- 20 5. Language access;
- 21 6. More effective outreach to customers in need of bill assistance; and
- 22 7. Communications related to disconnection policies.

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<sup>2</sup> Docket UG-240008, Order 05, App. A ¶ 26.

1 Further, the Final Order requires Cascade to allow the EAG to select the order in which  
 2 the topics would be discussed, but clarifies that the topics could be discussed over time  
 3 so as to allow for meaningful dialogue.<sup>3</sup> Cascade discussed the schedule for the meeting  
 4 topics with the EAG at the January 17, 2025, meeting. The schedule was revised and  
 5 discussed again at the March 14, 2025, meeting. Please see Exhibit NO-3 for the EAG  
 6 meeting agendas and Exhibit NO-4 for the presentation I used to walk the EAG  
 7 members through an overview of the MYRP outcome and the EAG discussion topics  
 8 identified in the MYRP settlement agreement.<sup>4</sup>

9 **Q. Did Cascade discuss the required topics with its EAG?**

10 A. Yes. Cascade addressed the seven topics agreed upon in the Final Order on the meeting  
 11 dates identified in Table 1 below.

12 **Table 1 – Settlement Topics of Discussion with EAG<sup>5</sup>**

<b>Meeting Topics</b>	<b>Meeting Dates</b>
1. Vendor selection	March 14, 2025; July 11, 2025
2. Soliciting representation from all 14 vulnerable populations	January 17, 2025
3. EAG meeting logistics	January 17, 2025; March 14, 2025; January 23, 2026
4. Commission Policy Statement in Docket U-240013 and IRA/IIJA Funding Opportunities	August 15, 2025
5. Language Access Plan	May 9, 2025; October 17, 2025
6. More effective outreach for customers in need of bill assistance	May 9, 2025
7. Communications related to Disconnection Policies	June 13, 2025

<sup>3</sup> *Id.* ¶ 27.

<sup>4</sup> Please note that the November 2025 meeting was canceled due to the unavailability of key personnel and the December 2025 meeting was canceled because Cascade staff and EAG members were experiencing evacuations due to the severe flooding across western Washington caused by an influx of atmospheric rivers.

<sup>5</sup> Exhibit NO-3 contains the EAG meeting agendas for the calendar year 2025.

1 **Q. What were the results of the EAG conversations on the above-mentioned topics?**

2 A. Overall, the conversations were very useful in better integrating an equity lens into  
3 Cascade's daily operations. In separate subsections below, I provide an overview of the  
4 discussions Cascade had with the EAG on each topic. Each overview includes a look  
5 at the EAG's recommendations and the outcome.

6 **A. Vendor Selection**

7 **Q. Please summarize Cascade's discussion with the EAG on vendor selection.**

8 A. Cascade discussed its vendor selection demographics with its EAG on March 14, 2025.  
9 Answers to follow-up questions were provided at the April 11, 2025, meeting, and the  
10 topic was revisited at the July 11, 2025, meeting.<sup>6</sup> At the March 14, 2026, meeting,  
11 Cascade presented Table 2 below, which presents the total dollars Cascade's parent  
12 company, MDU Resources, spent through contracts with suppliers and how many of  
13 these contracts and the associated dollar amounts were awarded to vendors which self-  
14 reported as being owned by someone with veteran or minority status related to race or  
15 gender.

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<sup>6</sup> Ortiz, Exh. NO-3 at 4, 7.

1

**Table 2 – CNGC Vendor Spending by Demographics**

MDU Resources			
Supplier Spending	\$ 408,341,294.00		
Number of Suppliers	799		
Supplier Demographics (Current)	Spent Amount	Percent of Spent	Supplier Count
African American/Black	\$ 6,560.00	0.0016%	2
Asian/Pacific Island	\$ -	0.0000%	0
Hispanic	\$ 7,008.00	0.0017%	1
Indian SubContinent	\$ 3,121.00	0.0008%	1
Native American	\$ 900,922.00	0.2206%	2
Minority Owned-Ethnicity: N/A	\$ 6,807,997.00	1.6672%	15
Women Owned	\$ 7,778,015.00	1.9048%	40
Veteran Owner	\$ 365,925.00	0.0896%	4
Total	\$ 15,869,548.00	3.886%	65

2 **Q. What was the result of the conversation?**

3 A. The EAG requested that Cascade add disabled- and LGBTQ-owned vendors to its  
4 tracking, which Cascade agreed it would do. Slides 2 through 5 of Exhibit NO-5,  
5 Vendor Selection Presentation, list the EAG members questions from the prior meeting  
6 and provide Cascade’s responses.

7 The March 2025 conversation with the EAG led the MDU Resources’  
8 Purchasing Department to develop a Supplier Tracking Sheet, provided in Exhibit  
9 NO-6, to be used when assessing bids and choosing vendors for contracts exceeding  
10 \$150,000. This added step within the procurement process adds an equity lens to the  
11 process and transparency to the outcomes. Cascade has committed to reviewing this  
12 topic annually with its EAG for continued evaluation of and ongoing improvement with  
13 equitable vendor selection.

1 **B. EAG Representation**

2 **Q. Please summarize Cascade’s discussion with the EAG on vulnerable community**  
3 **member solicitation.**

4 A. The Final Order says that Cascade and EAG should verify that its initial identification  
5 of 14 vulnerable communities within its service territory are still accurate and should  
6 then consider soliciting representation from each affected area. To prepare for the  
7 discussion, Cascade reviewed the vulnerable communities within its service territory  
8 and then aligned the areas with each current member’s constituency to review gaps in  
9 representation. At the January 17, 2025, EAG meeting, Cascade presented Table 3  
10 below which shows that areas in Yakima County are the most economically  
11 disadvantaged (93 to 98 percent) and are well represented in the EAG.

12 **Table 3 – 2025 EAG Representation**

Current County Representation			Economic Disadvantage %
Yakima County	WA	Grandview	94%
Yakima County	WA	Granger	97%
Mason County	WA	Shelton	88%
Yakima County	WA	Sunnyside	95%
Yakima County	WA	Toppenish	95%
Yakima County	WA	Union Gap	93%
Yakima County	WA	Wapato	98%

13 Table 4, however, identifies that the next tier of economically disadvantaged areas  
14 (80 to 90 percent) do not have EAG member representation.

1

**Table 2 – Unrepresented Areas in 2025 EAG**

Need County Representation			Economic Disadvantage %
Cowlitz County	WA	Castle Rock	80%
Cowlitz County	WA	Kelso	88%
Grays Harbor County	WA	McCleary	81%
Yakima County	WA	Moxee	85%
Whatcom	WA	Nooksack	85%
Adams County	WA	Othello	86%
Grant County	WA	Quincy	90%

2 **Q. What was the result of the conversation?**

3 A. Cascade asked its members if they wanted to extend membership to the unrepresented  
4 areas and if they were comfortable with having overlaps in representation. The EAG  
5 members answered affirmatively to both questions, so Cascade began efforts to solicit  
6 new EAG members.

7 Cascade launched an email campaign in January 2026 to solicit membership.  
8 See Exhibit NO-7 for the email that was sent to Washington customers. The campaign  
9 was sent broadly within Cascade’s service territory to maximize its response rate,  
10 knowing that applicants representing vulnerable areas will be prioritized in the review  
11 process.

12 The response to Cascade’s EAG email solicitation has been strong, with both  
13 positive and negative respondents. Cascade plans to review applications and select new  
14 EAG members in the second quarter of 2026. As with its initial campaign, applicants  
15 must demonstrate lived experience, work with vulnerable populations, and commit to  
16 monthly meetings. After selection to join the EAG, new members will receive onboard  
17 training on utility operations as well as training on expectations for the EAG prior to  
18 being introduced to existing members. Cascade strives to complete this process before  
19 the end of June 2026.

1 **C. EAG Meeting Logistics**

2 **Q. Please summarize Cascade’s discussion with the EAG on meeting logistics.**

3 A. At the January 17, 2025, March 14, 2025, and January 23, 2026, EAG meetings,  
4 Cascade discussed meeting logistics with its EAG members.<sup>7</sup> Logistics include the  
5 meeting day and week of the month, the meeting time, the stipend amount, whether to  
6 meet remotely or in-person, and whether any other accommodations, such as childcare,  
7 a translator, or a meal, would assist members in better attending and focusing each  
8 EAG meeting.

9 **Q. What was the result of the conversation?**

10 A. EAG members vocalized their preference to maintain meetings on the third Friday of  
11 the month and to keep meetings remote. The time of each meeting was moved up from  
12 9 a.m. to 8:30 a.m. Since meetings are remote, childcare and meals were not identified  
13 as a need. EAG members are satisfied with the current stipend for the workload  
14 expected of them.

15 Cascade plans to discuss meeting logistics annually every January as well as  
16 when new members are onboarded. A systematic cadence of checking in on logistics is  
17 a useful means to make sure that changes within an EAG members’ lives or schedules  
18 can be considered and accommodated.

19 **D. Infrastructure Investment and Jobs Act / Inflation Reduction Act**

20 **Q. Please summarize Cascade’s discussion with the EAG on federal laws.**

21 A. The Final Order required Cascade to speak with the EAG about the Company’s  
22 consideration or use of funding or tax credits from either the IIJA or the IRA on its

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<sup>7</sup> Ortiz, Exh. NO-3 at 1, 3, 11.

1 planned infrastructure investments. The IIJA is a federal law that provides funding for  
2 infrastructure, energy system modernization, resilience, and programs intended to  
3 promote equitable access to essential services.<sup>8</sup> The IRA is a federal law that supports  
4 clean energy deployment, emissions reduction, and consumer cost relief, with an  
5 emphasis on environmental justice and benefits to underserved communities.<sup>9</sup> At the  
6 August 15, 2025, EAG meeting, Cascade presented the IIJA and IRA and the  
7 Company’s consideration of the available funding and tax credits under IIJA and IRA  
8 and how these acts impact Cascade’s long term resource planning. Please see Exhibit  
9 NO-3 for the EAG meeting agendas and Exhibit NO-8 for the presentation on  
10 IIJA/IRA.

11 Cascade explained that the IIJA and the IRA change outcomes when the  
12 Company is assessing supply-side resource needs and how to fulfill them for future  
13 demand. The IIJA and the IRA incentivize low-carbon fuel development, support  
14 electrification, such as customer transition to heat pumps, and offer tax credits for low-  
15 carbon alternative fuels. Cascade has identified opportunities to use IRA tax credits for  
16 renewable projects and investments and will continue to monitor the opportunities of  
17 IIJA/IRA. The impacts—both the opportunities and the changed outcomes—of  
18 IIJA/IRA will be analyzed through Cascade’s integrated resource planning process.

19 **Q. What was the result of the conversation?**

20 A. The conversation about the IIJA/IRA was fairly technical and requires ongoing  
21 monitoring and analysis to understand the outcomes. Due to the nature of the topic, the  
22 presentation did not result in any follow-up questions from EAG members but because

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<sup>8</sup> See generally, Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, 135 Stat. 429 et. seq. (2021).

<sup>9</sup> See generally, Inflation Reduction Act, Pub. L. No. 117-169, 136 Stat. 1818 et. seq. (2022).

1 the One Big Beautiful Bill Act (“OBBBA”) enacted in July 2025, modified IRA,<sup>10</sup> the  
2 conversation focused on the concerns members’ constituencies have related to the  
3 OBBBA, specifically people’s fear of losing Medicare and Medicaid and general  
4 affordability of necessary services.

5 **E. Language Access Plan**

6 **Q. Please summarize Cascade’s discussion with the EAG on the language access plan.**

7 A. At the May 9, 2025, EAG meeting, Cascade’s contractor, Empower Dataworks Inc.,  
8 presented the plan to develop a language access plan. The goal of the plan was to  
9 identify potential language barriers within Cascade’s communications, especially its  
10 media, regarding low-income programs. The EAG provided guidance on items they  
11 wanted to see in the plan such as the readability of translations and consideration for  
12 literacy limitations. Empower Dataworks, Inc. presented the finalized plan to the EAG  
13 on October 17, 2025.<sup>11</sup> A full discussion of the plan, a summary of its contents, and a  
14 discussion of the recommendations is provided in the Direct Testimony of Dan L. Tillis  
15 (Exhibit DLT-1T). The language access plan is Attachment C to Cascade’s 2024-2025  
16 CARES Annual Report provided as Exhibit DLT-4.

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<sup>10</sup> See generally, One Big Beautiful Bill Act, Pub. Law. 119-21, 139 Stat. 72 et. seq. (2025).

<sup>11</sup> Ortiz, Exh. NO-3 at 10.

1 **F. Bill Assistance Outreach**

2 **Q. Please summarize Cascade’s discussion with the EAG on effective bill assistance**  
3 **outreach.**

4 A. On May 9, 2025, Cascade provided the EAG with a detailed overview of its CARES  
5 outreach efforts.<sup>12</sup> This topic is also discussed in the Direct Testimony of Dan L. Tillis  
6 (Exhibit DLT-1T).

7 **Q. What was the result of the conversation?**

8 A. The EAG asked Cascade to focus on tribal outreach which Cascade then did. Cascade  
9 developed outreach materials, identified tribes within its service territory, and used  
10 multiple media channels to attempt to build direct relationships with the tribal  
11 leadership. Cascade’s efforts did not result in bridged relationships. The Company  
12 continues to seek warm hand-offs from its growing Community Based Organization  
13 (“CBO”) network.

14 In April 2026, Cascade auto-enrolled 640 low-income tribal customers into  
15 tier 5 of CARES and notified each affected customer through a letter. This auto-  
16 enrollment and the use of auto-enrollment as a tool for engaging hard-to-reach  
17 customers is discussed in the Direct Testimony of Dan L. Tillis (Exhibit DLT-1T).

18 **G. Disconnection Policies**

19 **Q. Please summarize Cascade’s discussion with the EAG on Cascade’s disconnection**  
20 **policies and communications.**

21 A. Cascade reviewed its disconnection policies and its disconnection communications  
22 with its EAG on June 13, 2025, and with its CARES Advisory Group on

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<sup>12</sup> Ortiz, Exh. NO-3 at 5; *see also* Tillis, Exh. DLT-5.

1 June 18, 2025.<sup>13</sup> Attachment A in the 2024-2025 CARES Annual Report included as  
2 Exhibit DLT-4 is the presentation Cascade used in each meeting. This topic and the  
3 outcome of Cascade’s discussions with its advisory groups is discussed in detail in the  
4 Direct Testimony of Dan L. Tills (Exhibit DLT-1T).

#### 5 IV. EQUITY-RELATED REPORTING

6 **Q. Did the Final Order result in Cascade having equity-related reporting**  
7 **requirements?**

8 A. Yes. The Final Order adopted the performance-based ratemaking reporting  
9 requirements adopted in Docket U-210590 plus two affordability metrics.<sup>14</sup>

10 **Q. Did Cascade report on the affordability metrics included in the Final Order?**

11 A. Yes. Appendix A to Cascade’s Commission Basis Report filed April 30, 2025, included  
12 reporting on the two affordability metrics provided in the Final Order.<sup>15</sup>

#### 13 V. CASCADE’S VULNERABLE CUSTOMERS

14 **Q. Does Cascade have an understanding of where its most vulnerable communities**  
15 **are in its Washington service territory?**

16 A. Yes. Figure 1 below shows the number of Cascade residential customers living in  
17 vulnerable communities defined as either Highly Impacted Communities (“HICs”) or  
18 within tribal boundaries. HICs are communities that the Washington State Department  
19 of Health has determined are vulnerable based on composite rankings of 9 or 10 on a  
20 scale of 1 to 10 for multiple environmental, health, and socioeconomic factors at the  
21 census-tract level.

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<sup>13</sup> See Exhibit NO-3 for the EAG meeting Agendas and Exhibit DLT-2 for the June 18, 2025 CARES Advisory Group agenda.

<sup>14</sup> Docket UG-240008, Order 05 ¶¶ 83-84.

<sup>15</sup> Docket UG-250304, Cascade’s Commission Basis Report for the 12-month period ending December 31, 2024, App. A (Apr. 30, 2025).

1

**Figure 1 – Customers Living within HICs or Tribal Boundaries**

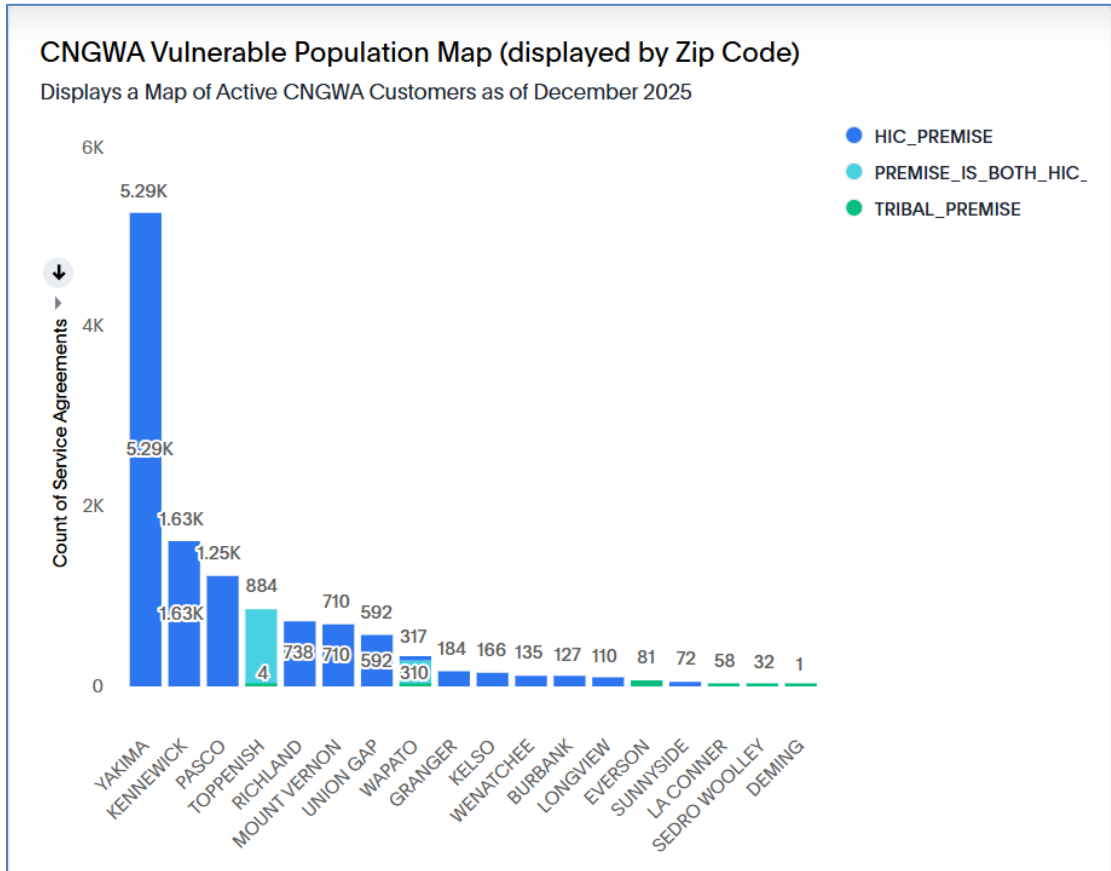


2 Cascade serves approximately 12,370 active residential customers who are  
3 living in vulnerable communities.

4 Figure 2 below shows the number of residential customers per city in areas  
5 identified as vulnerable—again, any area designated as an HIC 9 or 10 or within tribal  
6 lands.

1

**Figure 2 – Customers Living in HICs or Tribal Boundary**



2 **Q. Do all customers living in vulnerable communities struggle to pay their bills?**

3 A. No. Not all customers identified as living within a vulnerable community are low-  
4 income or struggle to pay their Cascade bills. Of the approximately 12,370 customers  
5 that reside in areas identified as vulnerable, 4,340 (approximately 35 percent) have  
6 not been identified as either low-income or energy burdened in the preliminary data  
7 provided by Empower Dataworks, which is performing Cascade’s 2026 Energy  
8 Burden Analysis. This is shown in Figure 3 below.

1

**Figure 3 – Vulnerable Customers’ Propensity to Pay**

<b>Cascade Natural Gas Struggle to Pay Model</b>		
<b>Row Labels</b>	<b>Premise Count</b>	<b>Percent of Segment</b>
<b>HIC_PREMISE</b>	<b>11003</b>	
Low Income Premises	4966	45.13%
No Known Concerns impacting Payment	3986	36.23%
Low Income and Burdened Premises	2044	18.58%
Non-Low-Income and Burdened Premises	7	0.06%
<b>PREMISE_IS_BOTH_HIC_AND_TRIBAL</b>	<b>1190</b>	
Low Income Premises	579	48.66%
No Known Concerns impacting Payment	344	28.91%
Low Income and Burdened Premises	265	22.27%
Non-Low-Income and Burdened Premises	2	0.17%
<b>TRIBAL_PREMISE</b>	<b>177</b>	
Low Income Premises	126	71.19%
Low Income and Burdened Premises	41	23.16%
No Known Concerns impacting Payment	10	5.65%
<b>Grand Total</b>	<b>12370</b>	

2 **Q. Why is it important that Cascade is able to identify the vulnerable communities**  
 3 **that it serves?**

4 A. As Cascade increases its focus on energy justice, Cascade can use HIC 9 and 10  
 5 rankings, and tribal boundaries data to identify communities where outcomes and the  
 6 distribution of benefits can be tracked and compared to baseline (all customer)  
 7 outcomes. While Cascade focuses on low-income customers when performing outreach  
 8 for its income-qualified programs, the Company employs a broader perspective when  
 9 considering restorative justice. Members of vulnerable communities may not struggle  
 10 to pay their bills, but they may experience barriers related to community vulnerabilities  
 11 or have outcomes that could be improved. Identifying HICs with a 9 or 10 ranking, and  
 12 tribal boundaries are foundational for the Company in its consideration and  
 13 prioritization of establishing CBO relationships, targeting accessibility of program  
 14 benefits like weatherization and considering Company decisions such as pipeline  
 15 enhancements verses non-pipeline alternatives.

1                   **VI.     FEEDBACK ON CASCADE’S RATE CASE PROPOSAL**

2   **Q.     Did Cascade seek feedback from its advisory groups on its general rate case**  
3   **proposal?**

4   A.     Yes. Cascade presented an overview of its rate case request to its EAG on April 24,  
5           2026, and to its CARES Advisory Group on April 15, 2026. The meeting agendas and  
6           rate case presentation are provided as Exhibit NO-9.

7   **Q.     How did the advisory groups respond to Cascade’s rate case proposal?**

8   A.     Members of the EAG and CARES Advisory Groups asked Cascade to expound on  
9           various rate case related topics. EAG members asked for more information on the  
10          drivers for the rate case and the history of the previous MYRP and provisional plan  
11          adjustments preceding this current rate case. CARES Advisory Group members, who  
12          are traditionally intervenors in all energy utility rate cases and, therefore, more familiar  
13          with the regulatory framework, asked Cascade to clarify its performance-based metric  
14          reporting proposal and to provide more detail on its proposal to hold known-low-  
15          income customers to a three to three and a half percent energy burden.<sup>16 17</sup> The  
16          Advisory Group members did not recommend any changes to Cascade’s rate case  
17          proposal and did not state any opposition to it.

18   **Q.     Will Cascade keep its advisory groups informed on the rate case proceeding?**

19   A.     Yes. Cascade will provide its advisory groups with proposed bill impacts, the rate case  
20          schedule, and links to the initial filing as well as the docket if they want to intervene or

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<sup>16</sup> The CARES Advisory Group is comprised of representatives from Public Counsel, Commission Staff, the Energy Project, NW Energy Coalition, Cascade, and the Community Action Agencies providing services within Cascade’s Washington service territory.

<sup>17</sup> See the Direct Testimony of Dan L. Tillis for the Company’s proposal to keep customers served on Schedule 302, CARES Discount Rates, at a three to three and a half percent energy burden, which is the program goal as stated in Schedule 302. Tillis, Exh. DLT-1T at 22.

1 file comments. Cascade will also make sure the advisory groups are aware of the public  
2 hearing, and once the proceeding is finalized, Cascade will present the final outcome  
3 to both groups.

4 **VII. CASCADE’S ONGOING COMMITMENT TO EQUITY**

5 **Q. What are Cascade’s short-term plans for continual growth in its application of**  
6 **equity to its daily operations?**

7 A. Cascade believes adopting an equity lens is a marathon, not a sprint. It requires taking  
8 hundreds of iterative steps to change institutionalized processes and thinking. Cascade  
9 has made many of those first iterative steps as put forward in my direct testimony filed  
10 in Cascade’s most recent MYRP, Docket UG-240008.

11 Listed below is an overview of the next steps Cascade seeks to take towards  
12 incorporating equity within its operations:

13 • **Develop an annually-required equity training for all employees.** In 2025,  
14 Cascade implemented an annual training requirement on equity for all  
15 managers, directors, and officers. In 2026, Cascade intends to deliver similar  
16 training to all Cascade employees. Familiarity with the tenets of energy justice  
17 and the use of common terminology related to equity will lay important  
18 foundational work toward further employee adoption of equity within daily  
19 practices.

20 • **Further develop Cascade’s CBO Network.** Cascade values the work CBOs  
21 do in providing vital services and assistance to vulnerable populations, and the  
22 Company also acknowledges that CBOs are “trusted messengers” among their  
23 community members. In an effort to further its reach among hard-to-reach

1 customers, in 2025, Cascade was able to forge collaborative relationships with  
2 two Washington CBOs.

3 The first CBO the Company built a partnership with in 2025, Inspire  
4 Development Centers, primarily serving migrant and seasonal workers, with a  
5 focus on providing high-quality early childhood education to low-income  
6 families in agricultural and rural communities. Inspire Development Centers  
7 operates 25 Head Start centers across Washington State. Inspire Development  
8 Centers has agreed to qualify clients for Cascade’s bill assistance program,  
9 CARES, using categorical eligibility.

10 The second CBO Cascade built a partnership with in 2025 is the Office  
11 of Superintendent Public Instruction (“OSPI”). OSPI’s mission is to provide the  
12 students of Washington’s 295 public schools and eight tribal schools with the  
13 funding, tools, and resources necessary so that each student receives a high-  
14 quality public education. OSPI, like Inspire Development Centers, has agreed  
15 to qualify its clients for CARES bill payment assistance using categorical  
16 eligibility.

17 Cascade plans to further work on developing its CBO network through  
18 face-to-face outreach, conversations with its partnering Community Action  
19 Agencies, and through the Company’s district offices and the CBO  
20 relationships district offices and/or their employees have.

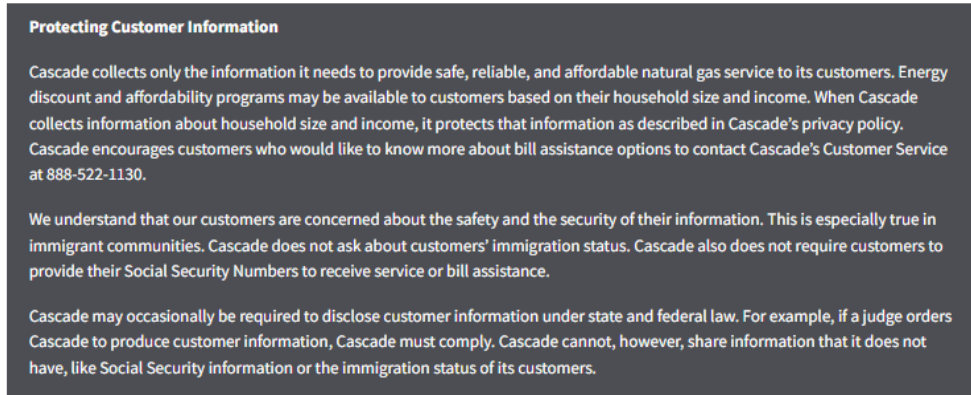
- 21 • **Address barriers customers have in reaching out to Cascade to access**  
22 **programs or services.** Through Cascade’s CBO relationships, the Company  
23 has been made aware of some of the barriers to service that its customers

1 experience. For instance, under the current administration, undocumented  
2 customers are concerned that Cascade may share their personal information  
3 with the U.S. Immigration and Customs Enforcement. They are also concerned  
4 that taking advantage of any utility bill payment assistance might result in being  
5 considered a “public charge” per 8 Section 212(a)(4) of the Immigration and  
6 Nationality Act. Being labeled a public charge could prevent a person from  
7 attaining legal residency status within the United States.

8 Having gained the understanding of these very real barriers to accessing  
9 programs and services, Cascade discussed the topics with its EAG and its  
10 CARES Advisory Group, and had its internal counsel perform research and  
11 recommend a means for extricating these barriers. A quick fix for both issues  
12 is not possible due to the complexities of competing priorities (e.g., assuring  
13 customers and obeying Federal or State laws or orders). Figure 1 below  
14 provides the language Cascade has posted on its Low-Income Assistance  
15 Programs webpage, which seeks to provide customers a level of security when  
16 obtaining services from Cascade while verifying that the Company must  
17 comply with state and federal laws, including subpoenas.

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## Figure 4 – Protecting Customer Information Website Statement<sup>18</sup>



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It is Cascade’s hope that this language provides customers with some level of comfort in sharing their information with the Company when applying for services.

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Regarding the concern that bill assistance may result in a customer being considered a public charge, Cascade found that the meaning of “public charge” is the subject of rules adopted by the U.S. Department of Homeland Security (“DHS”), which may change. A recent DHS rulemaking revised the agency’s interpretation of public charge. According to DHS, these revisions were intended to broaden the factors considered in the public charge test and empower officers to consider individual, case-specific circumstances. Cascade resolved that it cannot provide legal advice to individuals about what factors DHS officers may consider when interpreting and applying its new public charge rules. Cascade will continue to follow DHS’s rulemaking, but Cascade does not expect a clear or narrow definition to be adopted under the current administration.

<sup>18</sup> Available at: [https://www.cngc.com/customer-service/low-income\\_assistance\\_programs/](https://www.cngc.com/customer-service/low-income_assistance_programs/).

1                   In summary, Cascade will continue to track the issues discussed above  
2                   and seek to uncover other barriers customers encounter when trying to access  
3                   service, programs or other benefits. Cascade believes this ongoing process of  
4                   learning about barriers from CBOs, understanding them, and seeking to  
5                   mitigate them is important ongoing work of applying an equity lens. As with  
6                   the issues addressed above—sharing customer data and public charge—  
7                   bringing energy justice to customers is not a simple, “one and done” act but  
8                   rather a laborious process that will require revisiting issues again and again, and  
9                   collaborating on mitigation strategies.

- 10                   • **Apply a distribution equity analysis (“DEA”) to capital projects.** Cascade  
11                   has performed significant research into the development and application of a  
12                   DEA within its capital project planning process. Cascade has identified and held  
13                   information trainings with internal personnel who will be the subject matter  
14                   experts for the integration of DEA within their departmental workflows. The  
15                   Company has had multiple meetings with Washington state investor-owned  
16                   electric utilities on their adoption of DEA within their capital planning,  
17                   including any post project evaluations. Also, Cascade has been working with a  
18                   third-party contractor on the development and implementation of a DEA  
19                   process for Cascade. Cascade has wanted to align its efforts to the Commission  
20                   policy statement on DEAs that has been anticipated in Docket A-230217, but  
21                   continued delays may require the Company to move forward with DEA and  
22                   retrain or realign upon the issuance of Commission guidance.

- 1           • **Continue to track Docket U-210800.** As agreed in the Final Order, Cascade  
2           will track and ultimately comply with any rule changes adopted in Docket  
3           U-210800, which seeks to bring equity to vulnerable customers by revising the  
4           Washington Administrative Code (“WAC”) Chapter 480-90 rules, specifically  
5           the application of fees and deposits to low-income customers.<sup>19</sup>
- 6           • **Expand the reach of the Weatherization Incentive Pilot (WIP).** Cascade has  
7           struggled to broadly provide income-eligible customers with access to WIP, its  
8           whole home weatherization program offered to low-income customers at no  
9           direct costs. In 2025, Cascade started piloting the use of weatherization  
10          contractors as co-program administrators with Community Action Agencies.  
11          (See Docket UG-250058.) This was considered a success and in Docket  
12          UG-260089, Cascade filed to make the pilot program permanent, which was  
13          approved at the Commission’s April 9, 2026, public meeting. Cascade expects  
14          that 2026 will prove to be a banner year for WIP, installing more efficient  
15          equipment and making more homes comfortable for income-eligible customers.
- 16          • **Expand EAG membership and continue collaborative work.** As discussed  
17          above in response to questions about compliance to the Final Order, Cascade  
18          explained that in 2026, Cascade is seeking to expand its EAG membership and  
19          broaden the representation of its most vulnerable customers. Cascade expects  
20          this will happen by the end of the second quarter of 2026. Cascade will then  
21          continue to bring customer issues, program changes, communications, and

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<sup>19</sup> Docket UG-240008, Order 05 ¶ 84; *see* Customer Notice and Fees Rulemaking, Docket U-210800, Notice of Opportunity to Provide Comments, Attachment A (Mar. 13, 2026) (proposed changes to WAC Chapter 480-90).

1 significant filings or decisions before its EAG for a continuation of fruitful  
2 conversations.

3 While this list is not comprehensive of Cascade's short-term equity  
4 initiatives, it does provide an overview of the activities Cascade is engaged in  
5 to further promote energy justice for its customers and the community. It also  
6 demonstrates ongoing development of a corporate equity lens from the  
7 foundational work described in Exhibit NO-2. Equity is a foundational value  
8 for Cascade. The company is committed to conducting its operations in a  
9 manner that promotes fairness, accountability, and inclusive participation, and  
10 that recognizes the differing needs and circumstances of the customers and  
11 communities it serves.

## 12 VIII. CONCLUSION

13 **Q. Does this conclude your Direct Testimony?**

14 **A. Yes.**