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November 27, 2018

**VIA ELECTRONIC FILING**

Oregon Public Utility Commission  
Attn: Filing Center  
550 Capitol Street, N.E., #215  
P.O. Box 2148  
Salem, Oregon 97308-2148

Re: In the Matter of NORTHWEST NATURAL GAS COMPANY dba NW NATURAL  
Request for a General Rate Revision (Docket No. UG 344)  
**Phase II - Proposed Issue Fund Budget of the Alliance of Western Energy  
Consumers**

Dear Filing Center:

Pursuant to OAR § 860-012-0100(4), the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 18-017 (January 17, 2018), the Alliance of Western Energy Consumers (“AWEC”) hereby respectfully submits an issue fund budget of \$44,750, which after a 20% match by AWEC, is a net requested issue fund grant of \$35,800.

On October 26, 2018, the Commission issued Order 18-419. That order resolved most, but not all, of the issues raised in this proceeding. As memorialized in a ruling dated November 15, 2018 by Administrative Law Judge Arlow, one result of the order was to require an additional phase to address the unresolved issues. Specifically, Phase II of this docket will address the remaining Tax Cuts and Jobs Act adjustments that were not explicitly adopted in Order No. 18-419, as well as the resolution of the unrecovered pension balancing account balance.

AWEC previously submitted a budget and received payment of an Issue Fund Grant for the first phase of this docket. On January 19, 2018, AWEC, through its predecessor Northwest Industrial Gas Users (“NWIGU”), filed its initial Notice of Intent to Request an Issue Fund Grant. On March 5, 2018, NWIGU submitted a proposed budget for that Issue Fund Grant in the amount of \$97,625.00 less in-house resources of 20 percent, for a total of \$78,100.00. The Commission approved the Issue Fund Grant on March 13, 2018. *In the Matter of Northwest Natural Gas Company*, OPUC Docket UG 344, Order No. 18-082. On October 5, 2018, AWEC

filed a Request for Payment of the Issue Fund Grant, which the Commission approved. UG 344, Order No. 18-370.

Article 6.3 of the IFA states that: “In proceedings with multiple phases, proposed budgets should encompass work to be performed in the initial phase of the proceeding. In the event the proceeding continues beyond the initial phase, the Commission will establish a schedule for intervenors to submit proposed budgets for any later phase(s) of the proceeding.” When this proceeding entered into a second phase, no schedule was established for intervenors to submit proposed budgets. AWEC now seeks approval of a new budget for the second phase of this proceeding.

**1. A Statement of the Work to be Performed.**

AWEC has participated and will continue to participate in all stages of this proceeding. This includes continued participation in settlement conferences, drafting discovery and reviewing discovery responses, drafting testimony and briefs, and participation at hearing. AWEC retained a separate expert for earlier proceedings, and will continue to do so in this new phase.

**2. A Description of the Areas to be Investigated.**

AWEC will focus its efforts on evaluating NW Natural’s pension balancing account and the remaining Tax Cuts and Jobs Act issues that were not adopted in Order No. 18-419.

**3. A Description of the Particular Customer Class(es) That Will Benefit from the Intervenor’s Participation.**

AWEC is a nonprofit association consisting of more than forty end users of natural gas with major facilities in the states of Oregon, Washington, and Idaho. AWEC members include diverse industrial and commercial interests, including universities, food processing, pulp and paper, wood products, electric generation, aluminum, steel, chemicals, electronics, aerospace, and healthcare providers. AWEC members take service from NW Natural under industrial rate schedules. Accordingly, AWEC advocacy will benefit the industrial rate class, but it will also benefit other rate classes who have issues similar to AWEC’s issues.

**4. Identification of the Specific Fund Accounts from Which the Intervenor Is Seeking Monies.**

AWEC identifies the NW Natural Issue Fund Account as the account from which AWEC is seeking monies. As of November 27, 2018, there were \$109,472.79 of uncommitted funds available in that account. To the extent AWEC incurs costs that exceed this request, it will either seek modification of this request or seek Matching Funds.

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**5. A Budget Showing Estimated Attorney, Consultant and Expert Witness Fees, Which May Include the Cost for Appropriate Support Staff and Operations Support.**

AWEC has attached a detailed budget for AWEC's participation in this proceeding as Appendix A.

**6. Representation that Intervenor will use matching funds in the form of either in-house resources or outside funding to account for or pay at least 20 percent of the Eligible Expenses.**

AWEC represents that it will use matching funds in the form of either in-house resources or outside funding to account for or pay at least 20 percent of the Eligible Expenses.

**CONCLUSION**

AWEC respectfully request that the Commission approve its proposed budget for an issue fund grant in the amount of \$44,750, less the 20% matching requirement (\$8,950) for a net total issue fund grant of \$35,800, and that the budget be approved as expeditiously as possible. AWEC respectfully reserves the right to revise this request in the event the scope of this proceeding changes.

Should you have any questions regarding this filing, please call.

Very truly yours,



Tommy A. Brooks

APPENDIX A

UG-344

AWEC PROPOSED BUDGET FOR ISSUE FUND

Legal Counsel

<u>Work to be Performed</u>	<u>Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Cost</u>
Review of Discovery and Testimony and Assisting with AWEC Testimony	Partner	15	\$275	\$4,125
	Partner II	15	\$275	\$4,125
Settlement Conferences and Workshops	Partner	20	\$275	\$5,500
Briefs and Hearing	Partner	20	\$275	\$5,500
	Partner II	20	\$275	\$5,500
<b>Total AWEC Budget for Phase II Legal Services</b> (Cable Huston)				<b>\$24,750</b>
<b>Total AWEC Budget for Phase II Expert Witness Fees</b> (Bradley Mullins, Consultant, \$208/hr)				<b>\$20,000</b>
<b>Total Budget</b>				<b>\$44,750</b>
Less 20% Match Using In-house Resources				\$8,950
<b>Total Issue Fund Grant Request</b>				<b>\$35,800</b>