

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 344

In the Matter of)	
)	REQUEST FOR PAYMENT OF PHASE
NORTHWEST NATURAL GAS)	II ISSUE FUND GRANT OF
COMPANY, dba NW NATURAL,)	ALLIANCE OF WESTERN ENERGY
)	CONSUMERS
Request for a General Rate Revision.)	
)	
)	

Pursuant to Section 7.3 of the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Public Utility Commission of Oregon (“Commission”) in Order No. 18-017 (January 17, 2018), Alliance of Western Energy Consumers (“AWEC”) hereby requests payment of AWEC’s Issue Fund Grant in Phase II of Docket No. UG 344 in the amount of \$35,800. In support of this request, AWEC states the following:

1. On November 27, 2018, AWEC, fka Northwest Industrial Gas Users (“NWIGU”), filed a Proposed Issue Fund Budget for Phase II in this docket in the amount of \$44,750 less in-house resources of 20 percent, for a total grant request of \$35,800. The Commission approved the Issue Fund Grant in the amount of \$35,800 on December 10, 2018. *In the Matter of Northwest Natural Gas Company, dba NW Natural, Request for a General Rate Revision*, OPUC Docket No. UG 344, Order No. 18-462 (December 10, 2018).

2. The issues addressed in Phase II of this docket involved complex tax and pension issues, and after engaging in discovery and filing initial and cross answering testimony, the parties were able to negotiate a settlement stipulation that is currently

pending before this Commission. AWEC hereby requests that the Commission authorize payment of the approved Issue Fund Grant in this docket in the amount of \$35,800, (\$44,750 minus 20 percent), which is the full amount authorized. AWEC's Eligible Expenses for this proceeding through February 2019 are shown in Confidential Attachment A.

3. AWEC respectfully submits that this request for payment satisfies the requirement of IFA Section 7.3 as follows:

Section 7.3(a) - The itemized expenses, payees and hourly rates are attached as Confidential Attachment A.

Section 7.3(b) - AWEC was a full and active participant in this docket. AWEC and its consultants issued and reviewed data requests and responses, participated in multiple settlement conferences and discussions, filed initial and cross answering testimony on complex pension and tax issues, negotiated a stipulation and prepared testimony in support of the stipulation. The expenses included in Confidential Attachment A are Eligible Expenses as defined in IFA Section 7.4 and are reasonable and directly attributable to AWEC's participation in Phase II of UG 344 on behalf of all customers.

Section 7.3(c) - The only condition of the Issue Fund Grant is that AWEC must contribute 20% of Eligible Expenses using in-house resources. AWEC used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA.

Section 7.3 (d) - This request is a request for final payment of the approved issue fund in this docket.

4. Section 7.4 – All of the expenses included in Confidential Attachment A are Eligible Expenses as defined in Section 7.4 of the IFA and are consistent with AWEC’s proposed budget in this proceeding.

5. Upon approval of this request for payment by the Commission, NW Natural should send payment to AWEC as follows:

Alliance of Western Energy Consumers
818 SW Third Avenue #266
Portland, OR 97204

6. AWEC has satisfied the terms of the IFA and respectfully requests that the Commission approve payment of AWEC’s Issue Fund Grant in the amount of \$35,800 (\$44,750 minus 20 percent) from the NW Natural Issue Fund within 30 days of receiving this Request for Payment as provided in Section 7.6 of the IFA. With this payment, there will be no funds remaining in the approved Issue Fund Grant, and AWEC will seek the remainder of its fees and expenses through a Matching Funds request.

Dated this 19th day of March 2019.

CABLE HUSTON LLP



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