

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 344

In the Matter of)	
)	REQUEST FOR PAYMENT OF ISSUE
NORTHWEST NATURAL GAS)	FUND GRANT OF ALLIANCE OF
COMPANY, dba NW NATURAL,)	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 Docket No. UG 344 in the amount of \$78,100. In support of this request, AWEC shows the following:

1. On March 5, 2018, AWEC, fka Northwest Industrial Gas Users (“NWIGU”), filed a Proposed Issue Fund Budget in the amount of \$97,625 less in-house resources of 20 percent, for a total grant request of \$78,100. The Commission approved the Issue Fund Grant in the amount of \$78,100 on March 13, 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. 18-082 (March 13, 2018). Then, on April 1, 2018, NWIGU merged with the Industrial Customers of Northwest Utilities (“ICNU”) and ICNU changed its name to AWEC.
2. While the parties were able to settle most of the issues in this proceeding after initial and rebuttal testimony, including cost of capital, rate spread and design and

many revenue requirement issues, the remaining tax, pension and mist storage related matters were complex. Accordingly, AWEC used the entire approved Issue Fund in this matter. AWEC hereby requests that the Commission authorize payment of the approved Issue Fund Grant in this docket in the amount of \$78,100. (\$97,625 minus 20 percent), which is the full amount authorized. AWEC's Eligible Expenses for this proceeding through October 5, 2018 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 rebuttal testimony on a variety of issues, drafted joint settlement testimony with the other parties, and filed testimony and briefs in opposition to the three-party stipulation filed in this docket. 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 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 \$78,100 (\$97,625 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 5th day of October, 2018.

CABLE HUSTON LLP



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