

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UG 390**

In the Matter of

CASCADE NATURAL GAS  
CORPORATION,

Request for a General Rate Revision.

ALLIANCE OF WESTERN ENERGY  
CONSUMERS' NOTICE OF INTENT  
TO REQUEST ISSUE FUND GRANT

Pursuant to OAR 860-001-0120 and 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), Alliance of Western Energy Consumers (“AWEC”) hereby respectfully submits this Notice of Intent to Request an Issue Fund Grant in Docket UG 390. As required by the IFA, AWEC asserts the following:

1. UG 390 is an Eligible Proceeding under the IFA. The IFA defines an Eligible Proceeding as “any Commission proceeding that directly affects one or more of the Participating Public Utilities.” IFA, Section 1(c). UG 390 will directly affect Cascade Natural Gas Corporation (“Cascade”), a Participating Public Utility under Section 1(n) of the IFA. Therefore, an Issue Fund Grant is permissible under Section 6.1 of the IFA.

2. As required by IFA Section 6.2, this Notice of Intent is being served on each affected Participating Public Utility, all pre-certified organizations, and all parties identified on the service list for UG 390.

3. AWEC identifies the Cascade Issue Fund Account as the account from which AWEC intends to request the Issue Fund Grant. The amount of the request will depend on the availability of funds in that account when AWEC submits a budget.

4. AWEC is the successor to Northwest Industrial Gas Users (“NWIGU”), which is precertified under Section 5.2 of the IFA and OAR § 860-001-0120(3) as eligible to receive an

Issue Fund Grant. AWEC continues to meet the precertification requirements of Section 5.2 of the IFA because: it is a non-profit organization, the primary purpose of which is to represent utility customers' interests on an ongoing basis; it represents a broad group of customers directed at public utility rates; it has already demonstrated an ability to effectively represent large energy users and substantively contribute to the record on behalf of those customers; and its members that are customers contribute a significant portion of AWEC's overall funding.

5. AWEC will submit a budget in accordance with Section 6.3 of the IFA. AWEC will also coordinate with the Citizens' Utility Board of Oregon, which has indicated to AWEC that it will seek an Issue Fund Grant from the same account identified in this notice.

Dated this 1<sup>st</sup> day of April 2020.

Respectfully submitted,



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