

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 390

In the Matter of)	
)	REQUEST FOR PAYMENT OF ISSUE
CASCADE NATURAL GAS)	FUND GRANT OF ALLIANCE OF
CORPORATION)	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 390 in the amount of \$21,711. In support of this request, AWEC states the following:

1. On June 12, 2020, AWEC, fka Northwest Industrial Gas Users (“NWIGU”), filed a Proposed Issue Fund Budget in this docket in the amount of \$54,375, less in-house resources of 20 percent match by AWEC (\$10,875), that would have resulted in an issue fund grant of \$43,500. However, due to limited funds in the Cascade account, AWEC requested an Issue Fund Grant of \$21,711. The Commission approved the Issue Fund Grant in the amount of \$21,711 on June 17, 2020. *In the Matter of Cascade Natural Gas Corporation, Request for a General Rate Revision, OPUC Docket No. UG 390, Order No. 20-191 (June 17, 2020).*

2. This case involved Cascade's request to increase Oregon revenues by \$4,507,842 and involved revenue requirement, cost of capital, and rate spread and rate design issues. After filing testimony and participating in multiple settlement conferences, the parties were able to settle all of the issues in this docket. AWEC hereby requests that the Commission authorize payment of the approved Issue Fund Grant in this docket in the amount of \$21,711, which is the full amount authorized. AWEC will seek Matching Funds for the remainder of the fees and costs incurred in this matter. AWEC's Eligible Expenses for this proceeding through November 2020 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 issued and reviewed discovery, filed testimony and reviewed the testimony of other parties, participated in multiple settlement conferences, negotiated several stipulations and filed testimony in support of the stipulations. 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 390 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 Grant 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, Cascade 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 AWEC’s Issue Fund Grant in the amount of \$21,711 from the Cascade Issue Fund within 30 days of receiving this Request for Payment as provided in Section 7.6 of the IFA. AWEC will seek Matching Funds for the remainder of the fees and costs incurred in this matter.

Dated this 12th day of November, 2020.

CABLE HUSTON LLP



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