

and CCC have addressed community interests per OAR 860-001-0840 (1)(a) through analysis of cost allocations, impacts to customers, and utility resources. Per OAR 860-001-0840 (1)(d), CEP and CCC have effectively represent low-income and BIPOC ratepayers in NW Natural’s service territory because of their continued ties and commitment to furthering goals of equity.

CEP and CCC qualify to receive a Justice Funding Grant under OAR 860-001-0840 and the Justice Funding Agreement. Both organizations are pre-certified organizations under HB 2475.¹ The Commission has approved a Justice Funding Grant for both organizations, and on July 26, 2024, granted CEP and CCC’s amended case fund grant requests in Order No. 24-245. For the same reasons, the Commission should approve the amended budgeted requested herein.

2. Proposed budget

During the course of their participation in this matter, CEP and CCC incurred slightly higher costs than anticipated for the involvement of their staff. CEP incurred slightly higher expenses for staff time than anticipated in the amount of \$233.50. CCC incurred slightly higher expenses for staff time than anticipated in the amount of \$583.

b. Eligible Expenses for CEP²

Personnel	Hours	Rate	Cost
Previous Request (filed May/20/2024)			\$18,523
Additional staff time expenditures requested			\$233.50
TOTAL AMENDED REQUEST			\$18,756.50

¹ Or. Public Util. Comm’n Order No. 23-485 (Dec. 28, 2023), <https://apps.puc.state.or.us/orders/2023ords/23-485.pdf>.

² Note that CEP’s Pre-Certification Request reflected an expectation of participating in NW Natural’s rate case, but in expending the pre-certification funds CEP finds that it will be participating in NW Natural’s IRP update and phase 2 of the HB 2475 implementation process. See CEP’s Notice to Request HB 2475 Pre-Certification Funding, UM 2276 at 4 (Nov. 13, 2023), <https://edocs.puc.state.or.us/efdocs/HNA/um2276hna111037.pdf>. The amount requested here is in addition to the pre-certification funding request.

c. **Eligible Expenses for CCC**

Personnel	Hours	Rate	Cost
Previous Request (filed 3/14/2024)			\$13,478
Additional staff time expenditures requested			\$583
TOTAL AMENDED REQUEST			\$14,061

CEP and CCC respectfully request that the Commission approve this amended budget request, to allow for reimbursement of the above-described costs.

Dated this 8th day of November, 2024.

Respectfully submitted,

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AMENDED REQUEST FOR JUSTICE FUND GRANT &
 AMENDED BUDGET
 UG 490

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