EARTHJUSTICE

November 7, 2024

VIA ELECTRONIC FILING

Oregon Public Utility Commission
Attn: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: UG 490: Coalition's Request for Final Payment of Intervenor Funding

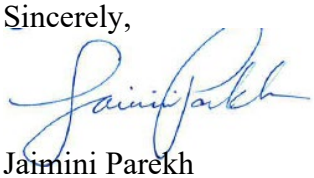
Dear Filing Center,

Enclosed for filing in Docket UG 490 is the Coalition's Request for Final Payment of Intervenor Funding. This filing is redacted and should be included on the public docket.

A confidential version of this filing will be transmitted under separate cover pursuant to Protective Order 23-132.

If you have questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Jaimini Parekh
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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 490

In the Matter of	)	REQUEST FOR FINAL PAYMENT
	)	OF INTERVENOR FUNDING TO
NORTHWEST NATURAL GAS COMPANY,	)	COMMUNITY ENERGY PROJECT,
dba NW NATURAL,	)	COALITION OF COMMUNITIES
	)	OF COLOR, AND VERDE
Request for a General Rate Revision.	)	
	)	REDACTED FOR PUBLIC DOCKET
	)	

In compliance with OAR 860-001-0800 through OAR 860-001-0900 and the Justice Funding Agreement adopted by the Oregon Public Utility Commission (Commission) in UM 2211 by Order 23-033 (February 7, 2023), Intervenors Community Energy Project (CEP), Coalition of Communities of Color (CCC), and Verde respectfully request payment of the requested intervenor funding in the amount of **$9,495** for CEP, **$7,333** for CCC, and **$8,333** for Verde.

CEP, CCC, and Verde filed their Notice of Intent to Request Justice Funding Case Fund Grant and Case Certification and Proposed Budget on March 14, 2024, which was amended and updated on May 20, 2024, to include fees and costs for an additional expert witness, Roger Colton. On July 26, 2024, Order No. 24-245 granted CEP, CCC, and Verde's case fund grant request and ordered 50 percent payment. A Justice Funding Case Fund Grant was approved for CEP up to $18,523. A Justice Funding Case Fund Grant was approved for CCC up to $13,478. A Justice Funding Case Fund Grant was approved for Verde up to $8,333. To date, no party has expressed any objection nor replied to the requests for funding filed by CEP, CCC, and Verde.

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CEP, CCC, and Verde's participation in this proceeding was directed at public utility issues affecting their communities, including low-income bill discount rates, fixed charges, advertising and lobbying expenses, procedural equity, and line extension allowances. CEP, CCC and Verde addressed community interests per OAR 860-001-0840 (1)(a) through analysis of cost allocations, impacts to customers, and utility resources. Further, Charity Fain, CEP Executive Director, and Nikita Daryanani, CCC Climate & Energy Policy Manager, provided expert testimony in this case.

In light of the contributions provided by CEP, CCC, and Verde to this proceeding, these groups respectfully request a final payment and disbursement of the amounts they requested for intervenor funding to support their participation in this case. The funding request filed by each of these groups included a line-item budget that accounts for their costs that were incurred and directly related to the issues raised in this matter. All expenses are reasonably and directly related to the issues, positions, and work produced by CEP, CCC, and Verde in docket UG 490.

All three organizations sought reimbursement to pay for expert fees and costs for two experts retained on their behalf in this case—Bradley Cebulko, and Roger Colton. CCC, CEP, and Verde requested only partial reimbursement for the invoice of Bradley Cebulko, in the amount of $3,333 each. A copy of Mr. Cebulko's invoice is included as Confidential Attachment A. Further, CCC, CEP, and Verde sought full reimbursement for the expert fees and costs for Roger Colton in the amount of $5,000 each. A copy of Mr. Colton's invoice is included as Confidential Attachment B.

With regard to Verde, a Justice Funding Case Fund Grant was approved for Verde of $8,333. Verde did not request any additional reimbursement for staff time and costs. However, unlike CCC and CEP, Verde has not yet received 50% partial payment of their justice funding

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request. Counsel for the Coalition has notified NW Natural that Verde has not yet received partial payment of its justice funding request. For this reason, Verde respectfully requests full reimbursement of its justice funding request in the amount of **$8,333** to pay for its expert fees and costs.

With regard to CEP, a Justice Funding Case Fund Grant was approved for CEP of $18,523 inclusive of expert fees and costs and staff time. Pursuant to Order 24-245, NW Natural made a partial payment of $9,262 to CEP. CEP files this request for final payment from NW Natural's 2024 Justice Fund Case Fund. CEP incurred slightly higher expenses for staff time than anticipated in the amount of $10,423.50. CEP respectfully requests reimbursement for this nominal increase in the total budget of $233.50. Accordingly, CEP respectfully requests reimbursement for the remaining justice funding in the amount of **$9,495**. CEP's itemized costs and supporting invoices are attached hereto as Confidential Attachment C.[1]

With regard to CCC, A Justice Funding Case Fund Grant was approved for CCC of $13,478. Pursuant to Order 24-245, NW Natural made a partial payment of $6,739 to CCC. CCC incurred slightly higher expenses for staff time than anticipated in the amount of $4,958. CCC respectfully requests reimbursement for this nominal increase in the total budget of $583. CCC files this request for final payment from NW Natural's 2024 Justice Fund Case Fund in the amount of **$7,322** inclusive of the increased cost of staff time. CCC's itemized costs and supporting invoices are attached hereto as Confidential Attachment D.

Based on these itemized costs and supporting invoices attached hereto as Attachments A through D, CEP requests intervenor funding disbursement of **$9,495**, CCC requests intervenor

[1] The hours break down as follows: Executive Director 14, Program Director 4.5, Climate Justice Associate 56.5, Advocacy Coordinator 5.5 and Communications Coordinator 2.5.

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funding disbursement of **$7,322**, and Verde requests intervenor funding disbursement of **$8,333** to support their participation in this case.

Dated this 7th of November, 2024.

Respectfully submitted,

s/ Jaimini Parekh
Jaimini Parekh, OSB No. 226337
Kristen L. Boyles, WBSA No. 23806
(Admitted *pro hac vice*)
Michael Mayer, WSBA No. 32135
(Admitted *pro hac vice*)
Noorulanne Jan, WBSA No. 61024
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s/ Carra Sahler
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Confidential Attachment A

WITHHELD

CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER 23-132

Confidential Attachment B

WITHHELD

CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER 23-132

Confidential Attachment C

WITHHELD

CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER 23-132

Confidential Attachment D

WITHHELD

CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER 23-132

EARTHJUSTICE

CERTIFICATE OF SERVICE
UG 490

I hereby certify that on November 7, 2024, I served an unredacted CONFIDENTIAL version of COALITION'S REQUEST FOR FINAL PAYMENT OF INTERVENOR FUNDING upon the Commission and each party designated to receive Confidential information pursuant to General Protective Order 23-132 through an encrypted email attachment.

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NW NATURAL JOCELYN C. PEASE (C)(HC) MCDOWELL RACKNER & GIBSON PC 419 SW 11th Ave., Ste. 400 Portland, Oregon 97205 jocelyn@mrg-law.com	**NW NATURAL** ERIC NELSON (C)(HC) NW NATURAL 250 SW Taylor St. Portland, OR 97204 eric.nelsen@nwnatural.com
STAFF STEPHANIE ANDRUS (C)(HC) MARLI KLASS (C)(HC) DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION 1162 Court St. NE Salem, Oregon 97301-4096 stephanie.andrus@doj.state.or.us marli.klass@doj.state.or.us	**STAFF** MATTHEW MULDOON (C)(HC) PUBLIC UTILITY COMMISSION OF OREGON 201 High Street SE, Ste. 100 Salem, Oregon 97301 matt.muldoon@puc.oregon.gov

s/ Adam Hinz
Adam Hinz, Paralegal
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