

H
CABLE HUSTON
CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP ■ ATTORNEYS

CHAD M. STOKES
ADMITTED IN OREGON AND WASHINGTON

cestokes@cablehuston.com
www.cablehuston.com

August 18, 2009

VIA ELECTRONIC AND FIRST CLASS MAIL

Oregon Public Utilities Commission
Attn: Filing Center
550 Capitol Street NE, #215
P.O. Box 2148
Salem, OR 97308-2148

Re: UG 186 – In the Matter of AVISTA CORPORATION, DBA AVISTA
UTILITIES Request for General Rate Revision
Northwest Industrial Gas Users' (NWIGU) Proposed Budget

Dear Filing Center:

Enclosed for filing in the above referenced docket is the original and one copy of
NWIGU's Proposed Budget for an Issue Fund Grant.

Thank you for your assistance in this matter. Should you have any questions regarding
this matter, please feel free to contact me.

Very truly yours,



Chad M. Stokes

CMS: wc
Enclosure(s)

cc: UG 186 Service List (via e-mail and via first class mail to parties not waiving paper service)

\\Netapp01\prolaw_docs\26678\26678.806\349810.doc

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 186

In the Matter of)
)
AVISTA CORPORATION, dba AVISTA) PROPOSED BUDGET OF THE
UTILITIES,) NORTHWEST INDUSTRIAL GAS
) USERS FOR AN ISSUE FUND GRANT
Request for a General Rate Revision.)
)

The Northwest Industrial Gas Users (“NWIGU”) hereby submit its proposed budget for an issue fund grant in the amount of \$28,888.40. NWIGU is pre-certified and represents industrial customers of Avista Corporation, dba Avista Utilities (“Avista”) and Oregon’s two other gas local distribution companies (“LDCs”). NWIGU filed a Notice of Intent to Request an Issue Fund Grant along with its intervention on July 15, 2009.

The First Amended and Restated Intervenor Funding Agreement (“IFA”) provides that precertified intervenors seeking an issue fund grant must submit a proposed budget to the Commission. Accordingly, NWIGU has attached a detailed budget as Appendix A. In addition, the IFA requires the following information:

1) A statement of the work to be performed.

NWIGU has retained Cable Huston Benedict Haagensen & Lloyd LLP to review the proposed rate increase in this proceeding and to fully participate in the case. Assuming the case goes to hearing, NWIGU, through its attorneys will submit testimony, participate in settlement conferences, cross-examine witnesses, submit briefs and participate in oral argument. NWIGU has also retained GSD Associates, Inc. (“GSD”) as an expert in this case. NWIGU will share this expert with the Citizens’ Utility Board (“CUB”). GSD, on behalf of NWIGU and CUB, will

analyze Avista’s filing, analyze revenue requirement issues, and write testimony and participate in hearings.

2) A description of the areas to be investigated.

NWIGU’s participation in UG-186 will focus on revenue requirement issues, Avista’s cost of service study, Avista’s SB408 accrual adjustment and other issues raised by parties in this proceeding.

3) A description of the particular customer class(es) that will benefit from the intervenor’s participation.

All industrial gas customers of Avista will benefit from NWIGU’s participation in this docket.

4) Identification of the specific fund accounts from which the intervenor is seeking monies.

NWIGU identifies the Avista Account as the account from which NWIGU is seeking monies. NWIGU has consulted with CUB on the proposed budget and CUB and NWIGU will be sharing an expert in this case. The Avista issue fund grant has a balance of \$60,000—leaving enough to accommodate both NWIGU’s and CUB’s proposed budgets.

5) A budget showing estimated attorney, consultant and expert witness fees, which may include the cost for appropriate support staff and operations support.

NWIGU has attached a detailed budget for NWIGU’s participation in this proceeding as

Appendix A.

///

///

///

///

///

CONCLUSION

NWIGU respectfully requests that the Commission approve its proposed budget for an issue fund grant.

Dated this 18th day of August, 2009.

Respectfully submitted,



Chad M. Stokes, OSB No. 004007
Tommy A. Brooks, OSB No. 076071
Cable Huston
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-Mail: cstokes@cablehuston.com
tbrooks@cablehuston.com

Of Attorneys for the
Northwest Industrial Gas Users

ATTACHMENT A

**UG 186
NWIGU PROPOSED BUDGET
PHASE I**

Work to be Performed	Personnel	Hours	Rate	Costs
ATTORNEYS				
Prepare testimony	Partners	2	\$185	\$370.00
Review and respond to discovery	Partners	10	\$185	\$1,850.00
Prepare for and participate in settlement conferences	Partners	8	\$185	\$1,480.00
Prepare cross-examination statements	Partners	5	\$185	\$925.00
Attend hearings	Partners	10	\$185	\$1,850.00
Prepare briefs	Partners	40	\$185	\$7,400.00
Prepare for and attend oral argument	Partners	12	\$185	\$2,220.00
Total Hours:		87		
Total Costs:				\$16,095.00

Work to be Performed	Personnel	Hours	Rate	Total Costs Split Between NWIGU and CUB
CONSULTANT				
Investigate Avista's claimed plant additions, expenses and adjustments	Principal, Ellen Blumenthal	205	\$185	\$37,925.00
Estimated Non-Personnel Costs: Travel and related costs; mail, copying, telephone, fed-ex	Principal			\$2,106.00
Total Hours:		205		
Total Costs:				\$40,031.00
Total NWIGU Costs (50 percent):				\$20,015.50

NWIGU RESOURCES (20 PERCENT):	\$7,220.10
--------------------------------------	-------------------

TOTAL REQUESTED FUNDS (80 PERCENT):	\$28,888.40
--	--------------------