

TOMMY A. BROOKS

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October 3, 2012

**VIA ELECTRONIC FILING  
& FIRST CLASS MAIL**

Oregon Public Utility Commission  
Attn: Filing Center  
550 Capitol Street, N.E., #215  
P.O. Box 2148  
Salem, Oregon 97308-2148

**Re: *In the Matter of the Northwest Natural Gas Company*  
*Application for General Rate Case -- Docket No. UG 221***

Dear Filing Center:

Enclosed for filing in the above-referenced matter, please find an original and one (1) copy of the **Request for Payment of Issue Fund Grant of the Northwest Industrial Gas Users**. Please note Exhibit A to the Request is Confidential and should not be posted to the Commission website. The confidential Exhibit will only be provided via mail to the Commission and to NW Natural.

A copy of the attached, without the confidential exhibit, will be served on the current Service List via e-mail and/or first class mail.

Thank you for your assistance, and please do not hesitate to contact our office with any questions.

Very truly yours,



Tommy A. Brooks

cc: UG 221 Service List (via e-mail and/or first class mail)

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 221**

In the Matter of	)	
	)	REQUEST FOR PAYMENT OF ISSUE
NORTHWEST NATURAL GAS	)	FUND GRANT OF THE NORTHWEST
COMPANY	)	INDUSTRIAL GAS USERS
	)	
Application for a General Rate Revision	)	

Pursuant to Section 7.3 of the First Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) in Order No. 07-564 (December 19, 2007), the Northwest Industrial Gas Users (“NWIGU”) hereby request a progress payment of NWIGU’s Issue Fund Grant in Docket No. UG 221 in the amount of \$45,028. In support of this Request, NWIGU shows the following:

1. On January 13, 2012, NWIGU filed a Notice of Intent to Request an Issue Fund Grant in this docket. On February 23, 2012, NWIGU submitted a proposed budget in the amount of \$56,285 less in-house resources of 20 percent, for \$45,028. The Commission approved the Issue Fund Grant for NWIGU in the amount of \$45,028 on February 24, 2012. *In the Matter of Northwest Natural Gas Company, dba NW Natural Request for a General Rate Revision*, OPUC Docket No UG 221, Order No. 12-059 (Feb. 24, 2012).

2. NWIGU hereby requests that the Commission authorize payment of the Issue Fund Grant in this docket in the amount of \$45,028. NWIGU’s Eligible Expenses for this proceeding through July 31, 2012 are shown in Confidential Attachment A.

3. NWIGU respectfully submits that this request for payment satisfies the requirement of IFA Section 7.4 as follows:

Section 7.3(a) - The itemized expenses, payees and hourly rates are attached as Confidential Attachment A.

Section 7.3(b) - NWIGU is a full and active participant in this docket. NWIGU participated in extensive discovery in this proceeding, participated in formal Commission workshops, participated in informal meetings and telephone conferences with NW Natural, its consultants, Staff and CUB, filed testimony through its own Expert Witness Donald Schoenbeck (whose time is not part of this application), filed testimony through an Expert Witness (Hugh Larkin) shared with CUB, participated in settlement workshops and discussions, negotiated multiple settlement stipulations, and participated in the evidentiary hearing. The expenses included in Confidential Attachment A are Eligible Expenses as defined in IFA Section 7.4 and are reasonable and directly attributable to NWIGU's participation in UG 221 on behalf of all customers. NWIGU will seek matching funds for its participation in UG 221 for its efforts that were extended only on behalf of industrial customers.

Section 7.4(c) – NWIGU used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA. In addition NWIGU has supplied substantial resources in this proceeding through its Executive Director's active involvement in addition to the Eligible Expenses set forth on Attachment A, which Attachment reflects only those Eligible Expenses from outside legal counsel at the law

firm of Cable Huston Benedict Haagensen and Lloyd, LLP and NWIGU's expert witness, Hugh Larkin.

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 NWIGU's proposed budget in this proceeding. No conditions were placed on NWIGU's Issue Fund Grant in Order No. 12-059.

4. Upon approval of this request for payment by the Commission, NW Natural should send payment to NWIGU as follows (which address is different than NWIGU's mailing address for service):

Edward Finklea  
Executive Director  
Northwest Industrial Gas Users  
P.O. Box 2058  
Tualatin, Oregon 97062

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NWIGU has satisfied the terms of the IFA and respectfully requests that the Commission approve payment of NWIGU's Issue Fund Grant in the amount of \$45,028 within 30 days of receiving this Request for Payment as provided in Section 7.6 of the IFA. Even though this Request for Payment seeks payment of the entire amount authorized by the Commission in Order 12-059, it does not constitute a final Request for Payment.

NWIGU has already incurred costs beyond the budget proposed and approved by the Commission. This docket is ongoing and NWIGU may seek to amend its budget and request additional funds at a later date. To the extent NWIGU's Eligible Expenses are not covered by this Issue Fund Grant or any amended Issue Fund Grant, NWIGU reserves the right to recover these excess Eligible Expenses beyond the 20% match through NW Natural's 2012 Matching Fund Grant.

Dated this 3rd day of October, 2012.

CABLE HUSTON BENEDICT HAAGENSEN  
& LLOYD LLP

/s/ Tommy A. Brooks

Chad M. Stokes, OSB No. 004007

Tommy A. Brooks, OSB No. 076071

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Of Attorneys for the

Northwest Industrial Gas Users

**CERTIFICATE OF SERVICE**

I hereby certify that I caused to be served the foregoing **REQUEST FOR PAYMENT OF ISSUE FUND GRANT OF THE NORTHWEST INDUSTRIAL GAS USERS** via electronic mail and, where paper service is not waived, via postage-paid first class mail upon the following parties of record:

**NW Natural**  
Mark R. Thompson  
220 NW Second Avenue  
Portland, OR 97209  
[mark.thompson@nwnatural.com](mailto:mark.thompson@nwnatural.com)

**NW Natural – E-Filing**  
220 NW Second Avenue  
Portland, OR 97209  
[efiling@nwnatural.com](mailto:efiling@nwnatural.com)

**Citizens Utility Board**  
OPUC Dockets  
610 SW Broadway, Suite 400  
Portland, OR 97205  
[dockets@oregoncub.org](mailto:dockets@oregoncub.org)

**Citizens Utility Board**  
Robert Jenks  
610 SW Broadway, Suite 400  
Portland, OR 97205  
[bob@oregoncub.org](mailto:bob@oregoncub.org)

**Citizens Utility Board**  
G. Catriona McCracken  
610 SW Broadway, Suite 400  
Portland, OR 97205  
[catriona@oregoncub.org](mailto:catriona@oregoncub.org)

**McDowell, Rackner & Gibson**  
Lisa Rackner  
419 SW 11th Avenue, Suite 400  
Portland OR 97205  
[lisa@mcd-law.com](mailto:lisa@mcd-law.com)

**Department of Justice**  
Jason Jones  
Business Activities Section  
1162 Court ST NE  
Salem, OR 97301-4096  
[jason.w.jones@state.or.us](mailto:jason.w.jones@state.or.us)

**Public Utility Commission**  
Judy Johnson  
P.O. Box 2148  
Salem, OR 97308-2148  
[judy.johnson@state.or.us](mailto:judy.johnson@state.or.us)

**NW Energy Coalition**  
Wendy Gerlitz  
1205 SE Flavel  
Portland, OR 97202  
[wendy@nwenergy.org](mailto:wendy@nwenergy.org)

**Community Action Partnership of Oregon**  
Jess Kincaid  
PO Box 7964  
Salem, OR 97301  
[jess@caporegon.org](mailto:jess@caporegon.org)

**Northwest Pipeline GP**  
Teresa Hagins  
8907 NE 219<sup>th</sup> Street  
Battle Ground, WA 98604  
[teresa.i.hagins@williams.com](mailto:teresa.i.hagins@williams.com)

**Northwest Pipeline GP**  
Stewart Merrick  
295 Chipeta Way  
Salt Lake City, UT 84108  
[stewart.merrick@williams.com](mailto:stewart.merrick@williams.com)

**Portland General Electric**  
Randy Dahlgren  
121 SW Salmon Street – 1WTC0702  
Portland, OR 97204  
[Pge.opuc.filings@pgn.com](mailto:Pge.opuc.filings@pgn.com)

**Portland General Electric**  
Douglas C. Tingey  
121 SW Salmon Street – 1WTC13  
Portland, OR 97204  
[Doug.tingey@pgn.com](mailto:Doug.tingey@pgn.com)

Dated in Portland, Oregon, this 3rd day of October 2012.

/s/ Tommy A. Brooks

Chad M. Stokes, OSB No. 004007  
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Of Attorneys for the  
Northwest Industrial Gas Users