

  
**CABLE HUSTON**<sub>LLP</sub>

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March 31, 2014

**VIA ELECTRONIC FILING & U.S. 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 PUBLIC UTILITY COMMISSION OF OREGON, Investigation  
into Treatment of Pension Costs in Utility Rates  
**Docket No. UM 1633**

Dear Filing Center:

Enclosed please find the original and one (1) copy of the REQUEST FOR PARTIAL PAYMENT OF ISSUE FUND GRANT OF NORTHWEST INDUSTRIAL GAS USERS' in the above-referenced docket.

Thank you for your assistance with this filing. Should you have any questions, please feel free to contact me.

Very truly yours,



Tommy A. Brooks

TAB:sk  
Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1633**

In the Matter of )  
 )  
PUBLIC UTILITY COMMISSION OF ) REQUEST FOR PARTIAL PAYMENT  
OREGON, ) OF ISSUE FUND GRANT OF  
 ) NORTHWEST INDUSTRIAL GAS  
 ) USERS  
Investigation into Treatment of Pension )  
Costs in Utility Rates )

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Pursuant to Section 7.3 of the Second Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) in Order No. 12-432 (November 20, 2012), Northwest Industrial Gas Users (“NWIGU”) hereby requests partial payment of NWIGU’s Issue Fund Grant in Docket No. UM 1633 in the amount of \$20,356.79, with \$6,785.60 paid from each of the Issue Funds for Avista, Cascade, and NW Natural. In support of this request, NWIGU shows the following:

1. On May 7, 2013, NWIGU submitted a proposed budget in the amount of \$41,160.00 less in-house resources of 20 percent, for \$32,928.00. The Commission approved the Issue Fund Grant for NWIGU in that amount on May 14, 2013. *In the Matter of Public Utility Commission of Oregon Investigation into Treatment of Pension Costs in Utility Rates*, OPUC Docket No. UM 1633, Order No. 13-176 (May 14, 2013). The Commission approved one-third of that amount for each of the Issue Funds for Avista, Cascade and NW Natural.

2. NWIGU hereby requests that the Commission authorize payment of the Issue Fund Grant in this docket in the amount of \$20,356.79. NWIGU's Eligible Expenses for this proceeding through December 31, 2013 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 and its consultants participated in discovery in this proceeding, participated in workshops, participated in informal meetings and telephone conferences with the PUC, retained its own expert Larkin & Associates (split with Industrial Customers of Northwest Utilities), and filed testimony in this proceeding. 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 UM 1633 on behalf of all 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 Haagenen and Lloyd, LLP and NWIGU's expert witness, Larkin & Associates (split with ICNU).

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. 13-176.

4. Upon approval of this request for payment by the Commission, Avista Corporation, Cascade Natural Gas Corporation and Northwest Natural Gas should each send payment of \$6,785.60 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

5. On March 21, 2014, in Order 14-101 the Commission approved a modified Issue Fund Budget for NWIGU in this matter. NWIGU therefore requests that the Commission approve this payment as a progress payment, and NWIGU will seek payment for the remainder of the funds within the approved revised budget when this matter concludes. NWIGU’s request relates only to expenses incurred in 2013. 2014 expenses will be requested pursuant to the revised budget.

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Dated this 31<sup>st</sup> day of March 2014.

CABLE HUSTON, LLP



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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 PARTIAL PAYMENT OF ISSUE FUND GRANT OF 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:

### **Citizens Utility Board**

Robert Jenks  
G. Catriona McCracken  
OPUC Dockets  
610 SW Broadway, Suite 400  
Portland, OR 97205  
[bob@oregoncub.org](mailto:bob@oregoncub.org);  
[dockets@oregoncub.org](mailto:dockets@oregoncub.org);  
[catriona@oregoncub.org](mailto:catriona@oregoncub.org)

David J. Meyer

**Avista Corporation**  
Vice President & Chief Counsel  
PO Box 3727  
Spokane, WA 99220-3727  
[David.meyer@avistacorp.com](mailto:David.meyer@avistacorp.com)

### **Avista Utilities**

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### **Cascade Natural Gas**

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Maryalice Rosales  
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[maryalice.rosales@cngc.com](mailto:maryalice.rosales@cngc.com)

### **Idaho Power Company**

Lisa D. Nordstrom  
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[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com);  
[dockets@idahopower.com](mailto:dockets@idahopower.com)

### **McDowell Rackner & Gibson**

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### **Northwest Natural**

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Portland, OR 97209  
[mark.thompson@nwnatural.com](mailto:mark.thompson@nwnatural.com);  
[efiling@nwnatural.com](mailto:efiling@nwnatural.com)

### **Public Utility Commission of Oregon**

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### **PUC Staff – Department of Justice**

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1162 Court Street, NE  
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### **Northwest Industrial Gas Users**

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**Portland General Electric**

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Douglas Tingey  
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[Doug.tingey@pgn.com](mailto:Doug.tingey@pgn.com)

**Pacific Power**

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Sarah Wallace  
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**Davison Van Cleve**

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Dated in Portland, Oregon, this 31<sup>st</sup> day of March 2014.



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Of Attorneys for the  
Northwest Industrial Gas Users