

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1720

In the Matter of)
) CUB REQUEST FOR AN ISSUE FUND
) GRANT & PROPOSED BUDGET
NORTHWEST NATURAL GAS COMPANY)
dba NW NATURAL)
)
Investigation into Long-Term Hedging Policy.)
_____)

The Citizens' Utility Board of Oregon (“CUB”) estimates eligible expenses of \$25,000, before the 20% match, and requests a grant of \$20,000 from the 2016 Northwest Natural (“NWN”) Issue Fund. CUB staff have been tracking their participation in this docket by hours and activity.

CUB is pre-certified per OAR 860-012-0100(3)(a). UM 1720 is an eligible proceeding under the Third Amended and Restated Intervenor Funding Agreement (“IFA”), as approved by the Oregon Public Utility Commission in Order No. 15-335, entered October 20, 2015. The proceeding directly affects NW Natural, which is a participating public utility under the IFA. *See* IFA at Article 1(k). CUB filed its Notice of Intent to Request an Issue Fund Grant concurrent with its Notice of Intervention, as required by the IFA (Article 6.2). CUB also requests a waiver of IFA Article 6.3, which sets the deadline for submitting proposed budgets at 30 days after the prehearing conference at which the schedule for the proceeding is established or by such other date as the Commission designates. The deadline for proposed budgets in UM 1720 was December 4, 2015. CUB does not believe that any party is harmed by its delayed request for an issue fund grant in this case.

Pursuant to paragraph 6.3 of the IFA, the proposed budget must identify certain points of information. CUB provides the information below.

(a) Statement of Work to Be Performed: CUB intends to participate in every procedural aspect of this case. CUB participated in the prehearing conference, all workshops, and settlement meetings. CUB will also attend and participate in the hearing scheduled for this docket. CUB has reviewed and analyzed the testimony and briefs filed in this docket, and will review the briefs yet to be filed. We have pursued discovery of NW Natural through data requests. We have filed testimony and a prehearing brief, and will participate in the hearing and file a post-hearing brief in this docket.

(b) Description of Areas to Be Investigated: CUB investigated issues including, but not limited to:

- i. The hedging policies of Local Distribution Companies.
- ii. What are the appropriate guidelines that the OPUC should apply to LDC hedging.
- iii. The benefits and risks associated with hedging, generally and particular long-term hedging.
- iv. Analysis of various hedging instruments, arrangements, or investments.
- v. Other issues raised by parties to this proceeding.

(c) Description of the Class or Classes Benefiting from CUB's Participation:

CUB represents the interests of NW Natural's residential customers, though other customer classes may benefit from many aspects of our participation.

(d) The Fund from Which CUB Seeks an Issue Fund Grant & Available Funds: CUB is seeking a \$20,000 grant from the 2016 NWN Issue Fund. CUB's budget shows eligible expenses, after the match, of \$25,000, but CUB limits its request in this case to \$20,000. Section 4.4 of the IFA permits the Commission to "approve an Issue Fund Grant from funds that will be made available in the next calendar year when the proceeding for which the Issue Fund are inadequate to provide the level of Issue Fund Grants that the Commission determines is appropriate." Although some work and settlement conferences for UM 1720 took place in

2015, significant activity is expected to take place in 2016. Given the limited funds available in NW Natural's 2016 Issue Fund, CUB respectfully requests that the Commission approve CUB's request for a \$20,000 grant from the 2016 NW Natural Issue Fund.

(e) *The Budget Showing Estimated Fees and Costs:* CUB's budget accompanies this document as Attachment A.

(f) *A Representation of the Use of Matching Funds:* The budget and an accounting for the use of matching funds accompany this document as Attachment

Dated this 22nd day of February, 2016

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bob Jenks", with a stylized flourish at the end.

Bob Jenks
Executive Director
Citizens' Utility Board of Oregon

CUB Proposed Budget -- UM 1720

CUB Internal Expenses	Rate	Hours	Cost
<i>Staff</i>			
Bob Jenks, Executive Director	\$250	29.00	\$7,250.00
Jaime McGovern, Senior Economist	\$225	31.00	\$6,975.00
Nadine Hanhan, Economist	\$125	31.00	\$3,875.00
Staff Attorney	\$175	31.00	\$5,425.00
Paralegal	\$75	18.00	\$1,350.00
<i>Other Expenses</i>			
Printing, Mailing & Travel			\$125.00
Outside Expert Witness			
<hr/>			
In-House Resources			
20% of Eligible Expenses			(\$5,000)
Total			\$20,000