BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 64

In the Matter of

NORTHWEST NATURAL GAS COMPANY dba NW NATURAL

2016 Integrated Resource Plan

NORTHWEST INDUSTRIAL GAS USERS' NOTICE OF INTENT TO REQUEST ISSUE FUND GRANT

Pursuant to Section 7.3 of the Third Amended and Restated Intervenor Funding Agreement ("IFA") approved by the Oregon Public Utility Commission ("Commission") in Order No. 15-335 (October 20, 2015), Northwest Industrial Gas Users ("NWIGU") hereby respectfully submit this Notice of Intent to Request an Issue Fund Grant in Docket No. LC 64. As required by the IFA, NWIGU asserts the following:

- 1. LC 64 is an Eligible Proceeding under the IFA. The IFA defines an Eligible Proceeding as "any Commission proceeding that directly affects one or more of the Participating Public Utilities." IFA, Section 1(c). LC 64 will directly affect Northwest Natural Gas dba NW Natural ("NW Natural"), a Participating Public Utility under Section 1(k) of the IFA. Therefore, an Issue Fund Grant is permissible under Section 6.1 of the IFA.
- 2. As required by IFA Section 6.2, this Notice of Intent is being served on each affected Participating Public Utility, all pre-certified organizations, and all parties identified on the service list for LC 64.
- 3. NWIGU identifies the NW Natural Issue Fund Account as the account from which NWIGU intends to request the Issue Fund Grant. The amount of the request will depend on the availability of funds in that account when NWIGU submits a budget.

PAGE 1 - NWIGU NOTICE OF INTENT TO REQUEST ISSUE FUND GRANT

- 4. NWIGU has been precertified under Section 5.2 of the IFA and OAR § 860-001-0120(3) as eligible to receive an Issue Fund Grant.
- 5. NWIGU will submit a budget in accordance with Section 6.3 of the IFA.

 NWIGU will also coordinate with the Citizens' Utility Board of Oregon, which has also filed a notice to seek an Issue Fund Grant from the same account identified in this notice.

Dated this 11th day of March 2016.

Respectfully submitted,

Chad M. Stokes, OSB No. 004007

Tommy A. Brooks, OSB No. 076071

Cable Huston LLP

1001 SW Fifth Ave., Suite 2000

Portland, OR 97204-1136

Telephone: (503) 224-3092 Facsimile: (503) 224-3176

Facsimile: (303) 224-3170

E-Mail: <u>cstokes@cablehuston.com</u> tbrooks@cablehuston.com

Of Attorneys for the Northwest Industrial Gas Users