

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1804

In the Matter

NW NATURAL GAS COMPANY dba
NW NATURAL,

Application to Approve a Corporate
Reorganization to Create a Holding
Company

NORTHWEST INDUSTRIAL GAS
USERS' NOTICE OF INTENT TO
REQUEST INTERVENOR FUNDING

Pursuant to OAR § 860-001-0120 and the Third Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 15-335 on October 20, 2015, Northwest Industrial Gas Users (“NWIGU”) hereby respectfully submits this Notice of Intent to Request an Issue Fund Grant in Docket No. UM 1804. Under the IFA, Notices of Intent are to be filed with Motions to Intervene. NWIGU has already filed a Motion to Intervene but a Notice of Intent was inadvertently omitted. NWIGU conferred with counsel for NW Natural and CUB, each of which indicated they do not oppose the timing of this filing. If the Commission requires, NWIGU can withdraw its earlier Motion to Intervene and re-file it with a Notice of Intent. However, as the prehearing conference in this case has not yet taken place, NWIGU respectfully requests that this filing be accepted instead.

As required by the IFA, NWIGU asserts the following:

1. UM 1804 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). UM 1804 will directly affect Northwest Natural Gas Company 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 UM 1804.

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.

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.

Dated this 17th day of February 2017.

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
E-Mail: cstokes@cablehuston.com
tbrooks@cablehuston.com

Of Attorneys for
Northwest Industrial Gas Users