



CHAD M. STOKES  
ADMITTED IN OREGON AND WASHINGTON

[estokes@cablehuston.com](mailto:estokes@cablehuston.com)  
[www.cablehuston.com](http://www.cablehuston.com)

October 3, 2019

**VIA FIRST CLASS AND ELECTRONIC MAIL**

Diane Davis  
Intervenor Funding Coordinator  
Public Utility Commission of Oregon  
201 High St. SE, Suite 100  
Salem, Oregon 97301

Mike Parvinen  
Senior Director-Regulatory Affairs  
Cascade Natural Gas Corporation  
8113 W. Grand Ridge Blvd.  
Kennewick, Washington 98336-7116

**Re: Alliance of Western Energy Consumers' Amended Request for Payment of a  
Preauthorized Matching Fund Grant – Cascade Utilities Account  
Docket No. UM 1929**

Dear Ms. Davis:

Alliance of Western Energy Consumers (“AWEC”) files this amended request for payment of a Preauthorized Matching Fund Grant for costs incurred from January 1, 2019 through August 31, 2019 from the Cascade Natural Gas Corporation (“Cascade”) Preauthorized Matching Fund Account in the amount of \$5,186.30. This amended request for payment is filed pursuant to Section 7.2 of the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) in Order No. 18-017 (January 17, 2018).

AWEC meets all of the criteria for payment of a Preauthorized Matching Fund Grant from the Cascade Preauthorized Matching Fund Account for 2019, as demonstrated by the following:

1. Under the Amended IFA, Cascade makes available an Annual Grant Amount of \$37,950, which is added to Cascade’s Preauthorized Matching Fund Account each calendar year during the term of the Amended IFA. IFA at Section 4.2.
2. A Preauthorized Matching Fund Grant from Cascade must be used solely to pay Eligible Expenses for Eligible Proceedings involving Cascade. IFA at Section 4.2.2. AWEC requests the payment of a Preauthorized Matching Fund Grant for Eligible Expenses incurred in Dockets UM 1909, UM 1927, UM 2004, UM 1929, and UG 370 as Eligible Proceedings from January 1, 2019 through August 31, 2019. AWEC requests the payment of the \$5,186.30 Preauthorized Matching Fund Grant for the expenses listed in confidential Exhibit A, attached, which are Eligible Expenses under Section 7.4 of the

October 3, 2019

Page 2

---

Amended IFA. These expenses are in excess of any amounts recovered through Issue Fund Grants and/or other Matching Fund Grant Requests.

3. A Preauthorized Matching Fund Grant may be provided only if AWEC demonstrates that it has used in-house resources or outside funding for at least 35% of the Eligible Expenses for Eligible Proceedings. Amended IFA at Section 7.2. As shown in confidential Exhibit A, AWEC has used in-house resources and outside funding for at least 35% of the Eligible Expenses in these proceedings.
4. AWEC is the successor to the Northwest Industrial Gas Users, which became precertified as eligible to receive intervenor funding grants under Section 5.2 of the original Intervenor Funding Agreement pursuant to Order No. 04-055, entered by the Commission on February 3, 2004. Under the current version of the IFA, funds from Cascade's Preauthorized Matching Fund Account are available for use exclusively by AWEC. Amended IFA at Section 4.2.2.

Having demonstrated that it meets all of the criteria and conditions for such request, AWEC requests payment of a Preauthorized Matching Fund Grant from Cascade's Preauthorized Matching Fund in the amount of \$5,186.30. AWEC requests that the Commission grant this amended request within 30 days of receipt and order Cascade to pay AWEC the amount of \$5,186.30 within 30 days after receipt of the Commission directive, in accordance with Section 7.2 of the Amended IFA.

Payment should be sent to the following address:

Alliance of Western Energy Consumers  
818 SW Third Avenue #266  
Portland, OR 97204

Thank you, and please do not hesitate to contact me if you have any questions.

Very truly yours,



Chad M. Stokes  
Counsel for Alliance of Western Energy Consumers

CMS:lms

Enclosure

cc: Ed Finklea (via e-mail)