

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1565

In the Matter of)	
)	CUB REQUEST FOR NORTHWEST
)	NATURAL, AVISTA AND
Investigation of Fuel Switching and Cross)	CASCADE NATURAL GAS ISSUE
Fuel Energy Efficiency Issues)	FUND GRANTS & PROPOSED
)	BUDGET

The Citizens' Utility Board of Oregon (CUB) requests a collective grant of \$14,780 from the Northwest Natural, Avista and Cascade Natural Gas Issue Funds. CUB proposes this grant budget be broken down in the following manner: \$7,390 from the Northwest Natural Issues Fund; \$3,695 from the Avista Issues Fund and \$3,695 from the Cascade Natural Gas Issues Fund. CUB staff will keep track of their participation by hours and activity.

CUB is precertified as per OAR 860-001-0120(3)(a). UM 1565 is an eligible proceeding under the First Amended and Restated Intervenor Funding Agreement (Order No. 07-564, entered December 19, 2007) as approved by the Oregon Public Utility Commission. The proceeding directly affects Northwest Natural, Avista and Cascade Natural Gas, which are participating public utilities under the IFA. *See* Order No. 07-564 at Article 1(k). CUB filed its Revised Notice of Intent to Request an Issue Fund Grant on January 25, 2012, as required by the IFAs.¹ *See* Order No. 07-564, Article 6.2; Order No. 10-396, Article 6.2.

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

¹ In its original filing of the Notice of Intent to Request an Issue Fund Grant, CUB mistakenly identified PacifiCorp, PGE and Idaho Power as the utilities from which CUB would be seeking an issue fund grant, rather than Northwest Natural, Avista and Cascade Natural Gas. This was an error on CUB's part that CUB has attempted to correct through its Motion to Admit CUB's Revised Intent to Request an Issue Fund Grant and CUB's Revised Notice of Intent to Request an Issue Fund Grant. Both were filed with the Commission on January 25, 2012. CUB apologizes for this error.

(a) *Statement of Work to Be Performed:* CUB intends to participate in every procedural aspect of this case. We participated in the first pre-hearing conference and will participate in the second one as well. We will attend, in person or by phone, and participate in all or most workshops and any settlement meetings, hearings, and Commission presentations as appropriate. Following the filing of the formal schedule in this docket CUB will review and analyze any comments or testimony and any briefs filed by other parties. We will pursue discovery through data requests, and will respond to data requests asked of us as appropriate. We will file comments, testimony, and briefs, and present our recommendations to the Commission, including any proposed modifications or conditions as appropriate.

(b) *Description of Areas to Be Investigated:* CUB intends to investigate issues relating to the Draft Straw Proposal including, but not limited to:

- A. Whether fuel switching is cost-effective primarily for gas customers;
- B. Whether there should be programs to incentivize customers to switch fuels; and
- C. Issues raised by other parties to the proceeding.

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

CUB represents the interests of Northwest Natural's, Avista's and Cascade Natural Gas's residential customers in Oregon.

(d) *The Fund from Which CUB Seeks an Issue Fund Grant & Available Funds:* CUB is seeking a collective issue fund grant of \$14,780 from the Northwest Natural, Avista and Cascade Natural Gas Issue Funds. Specifically, CUB proposes this grant budget be broken down in the following manner: \$7,390 from the Northwest Natural Issues Fund; \$3,695 from the Avista Issues Fund and \$3,695 from the Cascade Natural Gas Issues Fund. CUB's proposed budget of \$14,780 would leave roughly \$90,610 uncommitted in the Northwest Natural Issue Fund, \$56,305 uncommitted in the Avista Issue Fund and \$56,305 uncommitted in the Cascade Natural Gas 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 A.

Dated this 25th day of January, 2012
Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bob Parks". The signature is fluid and cursive, with a long horizontal stroke at the end.

Executive Director
Citizens' Utility Board of Oregon

Attachment A

CUB Budget - UM 1565

CUB Internal Expenses	Rate	Hours	Cost
<i>Staff</i>			
Bob Jenks, Executive Director	\$200	25	\$5,000
Catriona McCracken, General Counsel	\$200	30	\$6,000
Ray Meyers, Staff Attorney	\$150	5	\$750
Gordon Feighner, Utility Analyst	\$125	35	\$4,375
Sommer Templet, Staff Attorney	\$125	15	\$1,875
SA Anders, Business and Projects Mgr	\$75	3	\$225
 <i>Other Expenses</i>			
Printing & Mailing			\$100
Travel			\$150
 In-House Resources			
20% of Eligible Expenses			(\$3,695)
Total			\$14,780

UM 1565 – CERTIFICATE OF SERVICE

I hereby certify that, on this 25th day of January, 2012, I served the foregoing **CUB'S REQUEST FOR AN ISSUE FUND GRANT & PROPOSED BUDGET** in docket UM 1565 upon each party listed in the UM 1565 PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending 2 copies by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

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