


CABLE HUSTON
CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP ■ ATTORNEYS

TOMMY A. BROOKS
ADMITTED IN OREGON AND WASHINGTON

tbrooks@cablehuston.com
www.cablehuston.com

December 18, 2012

VIA ELECTRONIC FILING & U.S. MAIL

Oregon Public Utility Commission
Attn: Filing Center
550 Capitol Street, N.E., #215
P.O. Box 2148
Salem, Oregon 97308-2148

Re: In the Matter of Oregon Public Utility Commission –
Investigation into Treatment of Pension Costs in Utility Rates
Docket No. UM 1633

Dear Filing Center:

Enclosed please find the original and one (1) copy of the NORTHWEST INDUSTRIAL GAS USERS' NOTICE OF INTENT TO REQUEST AN ISSUE FUND GRANT in the above-referenced docket.

Thank you for your assistance with this filing. Should you have any questions, please feel free to contact me.

Very truly yours,



Tommy A. Brooks

TAB:sk
Enclosures

cc: UM 1633 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1633

In the Matter of

OREGON PUBLIC UTILITY
COMMISSION

Investigation into Treatment of Pension
Costs in Utility Rates

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

Pursuant to OAR § 860-001-0120 and the First Amended and Restated Intervenor Funding Agreement dated December 5, 2007 (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 07-564 on December 19, 2007, the Northwest Industrial Gas Users (“NWIGU”) hereby respectfully submit this Notice of Intent to Request an Issue Fund Grant in Docket No. UM 1633. As required by the IFA, NWIGU asserts the following:

1. UM 1633 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 1633 will directly affect Avista Utilities (“Avista”), Cascade Natural Gas Corporation (“Cascade”), and Northwest Natural Gas Company (“NW Natural”), each 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 1633.

3. NWIGU identifies the Avista Issue Fund Account, the Cascade Issue Fund Account, and the NW Natural Issue Fund Account as the accounts from which NWIGU intends to request the 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 accounts identified in this notice.

NWIGU notes that, by the time the proposed budget is due to be filed with the Commission for the proposed Issue Fund Grant, the IFA will have terminated and the Second Amended and Restated Intervenor Funding Agreement ("New IFA") will then be in effect, superseding the IFA. The material terms of the New IFA relating to the timing of this notice and a proposed budget remain the same as currently exist in the IFA. NWIGU requests that the Commission acknowledge this notice as satisfying the terms of both the IFA and the New IFA.

Dated this 18th day of December 2012.

Respectfully submitted,



Chad M. Stokes, OSB No. 004007
Tommy A. Brooks, OSB No. 076071
Cable Huston
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-Mail: costokes@cablehuston.com
tbrooks@cablehuston.com

Of Attorneys for the
Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

I CERTIFY that I have on this day served the foregoing document upon all parties of record in this proceeding via electronic mail and/or by mailing a copy properly addressed with first class postage prepaid.

Citizens Utility Board (W)
Robert Jenks
610 SW Broadway, Suite 400
Portland, OR 97205
bob@oregoncub.org

Citizens Utility Board (W)
G. Catriona McCracken
610 SW Broadway, Suite 400
Portland, OR 97205
catriona@oregoncub.org

Idaho Power Company
Lisa D. Nordstrom
PO Box 70
Boise, ID 83707-0070
lnordstrom@idahopower.com

Northwest Natural
Mark R. Thompson
220 NW 2d Avenue
Portland, OR 97209
mark.thompson@nwnatural.com

PUC Staff – Department of Justice
Jason W. Jones
Business Activities Section
1162 Court Street, NE
Salem, OR 97301-4096
jason.w.jones@state.or.us

Citizens Utility Board (W)
OPUC Dockets
610 SW Broadway, Suite 400
Portland, OR 97205
dockets@oregoncub.org

Idaho Power Company
Regulatory Dockets
PO Box 70
Boise, ID 83707-0070
dockets@idahopower.com

McDowell Rackner & Gibson
Lisa F. Rackner
419 SW 11th Avenue, Suite 400
Portland, OR 97205
dockets@mcd-law.com

Public Utility Commission of Oregon
Nicholas Cimmiyotti
PO Box 2148
Salem, OR 97308-2148
nick.cimmiyotti@state.or.us

Industrial Customers of Northwest Utilities
c/o Davison VanCleve
S. Bradley VanCleve
333 SW Taylor - STE 400
Portland OR 97204
bvc@dvclaw.com

Industrial Customers of Northwest Utilities

c/o Davison VanCleve

333 SW Taylor - STE 400

Portland OR 97204

mail@dvclaw.com

Dated in Portland, Oregon, this 18th day of December 2012.



Chad M. Stokes, OSB No. 004007

Tommy A. Brooks, OSB No. 076071

Cable Huston Benedict Haagensen & Lloyd

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 the

Northwest Industrial Gas Users