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March 13, 2014

VIA ELECTRONIC FILING & U.S. MAIL

Oregon Public Utility Commission
Attn: Filing Center
Public Utility Commission of Oregon
3930 Fairview Industrial Dr SE
Salem, Oregon 97302-1166

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 three (3) copies of Northwest Industrial Gas Users' Motion to Amend Approved Issue Fund Budget.

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' MOTION TO AMEND
APPROVED ISSUE FUND BUDGET

Pursuant to Article 6.7 of the Second Amended and Restated Intervenor Funding Agreement (“IFA”), Northwest Industrial Gas Users (“NWIGU”) submits this Motion to Amend its approved Issue Fund Budget in Docket UM 1633 from the Issue Funds of Avista Utilities (“Avista”), Cascade Natural Gas (“Cascade”) and NW Natural Gas (“NW Natural”).

On May 7, 2013, NWIGU submitted a proposed budget showing anticipated expenses of \$41,160.00 and seeking an Issue Fund Grant in the amount of \$32,928.00. On May 14, 2013, in Order No. 13-176, the Commission approved NIWGU’s budget.

NWIGU is now proposing to increase its budget in docket UM 1633 by \$21,000.00, resulting in total expenses of \$62,160.00, and seeking a total Issue Fund Grant of \$49,728.00 to be allocated among Avista, Cascade, and NW Natural as participating utilities in this docket. Because substantial time has already been spent on this docket in 2014, and because the remaining activity in this docket is scheduled to take place in 2014, NWIGU identifies the 2014 issue funds of each of those utilities as the funds from which it proposes to allocate the additional grants for each utility. Specifically, NWIGU proposes to allocate the additional fund as follow: \$7,000.00 from the 2014 Avista Issue Fund Grant; \$7,000.00 from the 2014 Cascade Issue Fund

Grant; and \$7,000.00 from the NW Natural Issue Fund Grant. As of March 11, 2014, the Issue Fund accounts for Avista, Cascade and NW Natural had uncommitted balances of \$34,322.41, \$60,667.00, and 40,531.41, respectively. Those accounts are therefore sufficient to accommodate NWIGU's increased budget request.

Section 6.7 of the IFA States:

At any time during the proceeding, an intervenor who received Commission approval for an Issue Fund Grant may file to amend its budget and request additional funding due to unforeseen changes in the scope or complexity of issues, positions taken by other parties, changes in the schedule of the case, or other good cause.

There is good cause to support approving NWIGU's proposed budget amendment. The scope and complexity of the issues in this docket have changed over time, as has the schedule. The parties had to first work with the Commission to determine the exact scope of the issues, and whether those issues should be bifurcated. The change in scope in the docket caused a corresponding shift in the schedule, including additional workshops and briefing that were not anticipated at the beginning of this case. NWIGU, like other parties, has also had to file multiple rounds of testimony to respond not only to the initial proposal in this docket, but also to respond to the position of other non-utility parties. NWIGU must still review rebuttal testimony, draft cross-answering testimony, prepare for a hearing and oral argument, and draft multiple rounds of legal briefs. Each of these tasks will require substantial additional time and resources. Therefore, NWIGU is seeking to increase its approved budget to \$62,160.00. NWIGU's amended budget accompanies this document as Attachment A.

Dated this 13th day of March 2014.

Respectfully submitted,



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Of Attorneys for the
Northwest Industrial Gas Users

ATTACHMENT A

UM-1633
 NWIGU REVISED BUDGET FOR ISSUE FUND

Legal Counsel

<u>Work to be Performed</u>	<u>Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Cost</u>
Review of Proceeding Scope and Discovery	Partner	15	\$220	\$3,300
	Partner II	15	\$210	\$3,150
Settlement Conferences	Partner	16	\$220	\$3,520
Testimony	Partner	34	\$220	\$7,480
	Partner II	26	\$210	\$5,460
Briefs	Partner	42	\$220	\$9,240
	Partner II	46	\$210	\$9,660
Hearings	Partner	20	\$220	\$4,400

Expert Witness

<u>Work to be Performed</u>	<u>Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Cost</u>
Expert Analysis and Testimony	Expert	106.33	\$150	\$15,950
Total NWIGU Budget for Legal and Expert Fees				\$62,160
Total NWIGU Issue Fund Budget Request				\$62,160
Less 20% Match Using In-house Resources				\$12,432
Total Issue Fund Grant Request				\$49,728

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.

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Dated in Portland, Oregon, this 13th day of March 2014.



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