

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1654

In the Matter of)
) CUB REQUEST FOR AN
) ISSUE FUND GRANT & PROPOSED
NORTHWEST NATURAL GAS) BUDGET
COMPANY, dba NW NATURAL)
)
Investigation of Interstate Storage and)
Optimization Sharing)
_____)

Pursuant to Section 6.3 of the Second Amended and Restated Intervenor Funding Agreement (“IFA”),¹ the Citizens' Utility Board of Oregon (“CUB”) requests a grant of \$5,008 from the 2014 NW Natural Issue Fund. CUB staff will keep track of their participation by hours and activity.

CUB is precertified per OAR 860-001-0120(3)(a) and Article 5.2(a) of the IFA. UM 1654 is an eligible proceeding under Article 1(c) of the IFA. UM 1654 directly affects NW Natural, which is a participating public utility under Article (k) of the IFA.

On June 4, 2013, CUB filed its Notice of Intent to Request an Issue Fund Grant concurrent with its Notice of Intervention, as required by the IFA (Article 6.2). However, because of the lack of funds in NW Natural’s 2013 issue fund, CUB did not seek an issue fund grant for this docket at that time. On February 3, 2014, the parties, including CUB, participated in the UM 1654 hearing during which the parties and Commission agreed to

¹The Second Amended and Restated Intervenor Funding Agreement was approved by the Commission in Order No. 12-452 (Nov. 20, 2012) and was subsequently supplemented by Exhibits A, B and C by Order No. 13-317 (Sept. 3, 2013).

additional process. Because of the additional time and resources that will be required as a result of the additional process, and because there are now available funds in NW Natural's 2014 issue fund for this case, CUB proposes an issue fund grant in the amount of \$5,008. CUB respectfully requests a waiver of Article 6.3, which states that "[t]he deadline for submitting proposed budgets will be 30 days after the prehearing conference at which the schedule for the proceeding is established or by such other date as the Commission designates." As stated above, at the time that proposed budgets were to be submitted in this docket, there were no available funds in NW Natural's issue fund; however, this docket has continued into 2014 and at this time, there are funds available in NW Natural's 2014 issue fund.

IFA Section 6.3 requires that the proposed budget identify certain points of information. We provide the information below.

(a) Statement of Work to Be Performed: CUB intends to participate in every remaining procedural aspect of this case. CUB is participating in setting a schedule for the remainder of the docket. We will attend, either in person or by phone, any workshops, hearings, and Commission presentations that may be scheduled in this proceeding. We will review and analyze NW Natural's oral and written testimony, and briefs. We will review and analyze testimony and briefs filed by other parties. We will pursue discovery of NW Natural through data requests, and will respond to data requests asked of us. We will draft and submit a closing brief, respond to any bench requests, and participate in oral argument. We will present our recommendations to the Commission, including any proposed modifications or conditions.

(b) Description of Areas to Be Investigated: CUB intends to investigate issues including, but not limited to:

- A. The new evidence introduced by NW Natural at the hearing; and
- B. Issues raised by other parties to this proceeding.

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

CUB represents the interests of NW Natural's residential customers, though other customer classes may benefit from many aspects of our participation.

(d) The Fund from Which CUB Seeks an Issue Fund Grant & Available Funds: CUB is seeking an issue fund grant of \$5,008 from the 2014 NW Natural Issue Fund. As of January 17, 2014, the 2014 NW Natural Issue Fund had an uncommitted balance of approximately \$68,872.41.

(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 19th day of February, 2014
Respectfully submitted,



Executive Director
Citizens' Utility Board of Oregon

CUB Proposed Budget -- UM 1654

CUB Internal Expenses	Rate	Hours	Cost
<i>Staff</i>			
Bob Jenks, Executive Director	\$250	8.00	\$2,000.00
Catriona McCracken, General Counsel	\$250	8.00	\$2,000.00
Jaime McGovern, Sr. Utility Analyst	\$225	4.00	\$900.00
Sommer Templet, Staff Attorney	\$175	4.00	\$700.00
Nadine Hanhan, Utility Analyst	\$125	4.00	\$500.00
SA Anders, Director of Operations	\$75	2.00	\$150.00
<i>Other Expenses</i>			
Printing, Mailing & Travel			\$10.00
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In-House Resources			
20% of Eligible Expenses			(\$1,252)
Total			\$5,008

UM 1654 – CERTIFICATE OF SERVICE

I hereby certify that, on this 19th day of February, 2014, I served the foregoing **CUB REQUEST FOR AN ISSUE FUND GRANT & PROPOSED BUDGET** in docket UM 1654 upon each party listed in the UM 1654 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 one original and one copy 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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Respectfully submitted,

A handwritten signature in cursive script that reads "Sommer Templet".

Sommer Templet, OSB #105260
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