

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1654

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

Pursuant to Section 6.3 of the Third Amended and Restated Intervenor Funding Agreement (“IFA”), the Oregon Citizens' Utility Board (“CUB”) requests a grant of \$30,000 from the 2017 NW Natural Issue Fund. CUB staff will keep track of their participation by hours and activity. CUB has coordinated this request with the Northwest Industrial Gas Users (“NWIGU”), and NW Natural’s Issue Fund Account for 2017 has sufficient funds for this request.

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.

Pursuant to the IFA, budgets are to be provided within 30 days of the initial prehearing conference in a docket. However, that deadline has long passed given the unique procedural posture of this docket. UM 1654 was opened on May 13, 2013 to consider whether the current sharing arrangement for NW Natural’s interstate storage and

optimization activities should be revised.¹ In Order No. 15-066 from UM 1654, the Commission ordered NW Natural to conduct a cost study with a steering committee and a third party consultant to determine how costs are generated and shared.² As of this date, this docket has entered the new phase contemplated by Order No. 15-066. On April 26, 2017 CUB and NWIGU submitted a joint motion seeking permission to submit late-filed budgets in this docket to cover the anticipated work in this new phase of UM 1654. That motion is pending for Commission decision, and CUB submits the budget attached here as Attachment A contingent on Commission approval of the motion. CUB and NWIGU have conferred with NW Natural, and the Company does not object to the timing of this budget request.

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 will participate in the steering committee's investigation of costs and sharing related to NW Natural's Mist interstate storage and optimization activities. This work will include participation in scoping meetings, potential site visits, participation in settlement conference, general oversight of the third party consultant's work, drafting testimony and briefs if necessary, and participation at a potential hearing.

(b) Description of Areas to Be Investigated: CUB intends to investigate issues including, but not limited to how costs are shared between the Company and its customers in its Mist storage facility.

¹ *In re NW Natural Investigation of Interstate Storage and Optimization Sharing*, OPUC Docket No. UM 1654, Order No. 15-066 at 1 (Mar. 5, 2015).

² *Id.*

(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 \$30,000 from the 2017 NW Natural Issue Fund. As of the date of this submittal, there was \$179,709.79 of uncommitted funds available in that account.

(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 1st day of May, 2017
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	80.00	\$20,000.00
Mike Goetz, Staff Attorney	\$175	91.00	\$15,925.00
Legal Assistant	\$75	20.00	\$1,500.00
 <i>Other Expenses</i>			
Printing, Mailing & Travel			\$75.00
<hr/>			
In-House Resources			
20% of Eligible Expenses			(\$7,500)
Total			\$30,000