

CHAD M. STOKES Admitted in Oregon and Washington

cstokes@cablehuston.com www.cablehuston.com

October 1, 2021

## VIA ELECTRONIC FILING

Diane Davis Intervenor Funding Coordinator Public Utility Commission of Oregon 201 High St. SE, Suite 100 Salem, Oregon 97301 Zachary Kravitz NW Natural 220 NW Second Avenue Portland, OR 97209-3991 Zachary.Kravitz@nwnatural.com

## Re: Alliance of Western Energy Consumers' Request for Payment of a Preauthorized Matching Fund Grant – NW Natural Utilities Account <u>Docket No. UM 1929</u>

Dear Ms. Davis:

Alliance of Western Energy Consumers ("AWEC") files this request for payment of a Preauthorized Matching Fund Grant for costs incurred from April 1, 2021 through September 30, 2021 from the Northwest Natural Gas Company ("NW Natural") Preauthorized Matching Fund Account in the amount of \$40,348.95. This request for payment is filed pursuant to Section 7.2 of the Fourth Amended and Restated Intervenor Funding Agreement ("IFA") approved by the Oregon Public Utility Commission ("Commission") in Order No. Order No. 18-017 (January 17, 2018).

AWEC meets all of the criteria for payment of a Preauthorized Matching Fund Grant from the NW Natural Preauthorized Matching Fund Account for 2021, as demonstrated by the following:

- 1. Under the Amended IFA, NW Natural makes available an Annual Grant Amount of \$79,482.78, which is added to NW Natural's Preauthorized Matching Fund Account each calendar year during the term of the Amended IFA. IFA at Section 4.2.
- 2. A Preauthorized Matching Fund Grant from NW Natural must be used solely to pay Eligible Expenses for Eligible Proceedings involving NW Natural. IFA at Section 4.2.2. AWEC requests the payment of a Preauthorized Matching Fund Grant for Eligible Expenses incurred in Dockets LC 71, UM 1929, UG 411, UM 2132, UM 2145, UI 451, EO 20-04/UM 2178, OR Emergency Deferral Workshop, UM 1286 and UG 432 as Eligible Proceedings from April 1, 2021 through September 30, 2021. AWEC requests payment of the \$40,348.95 Preauthorized Matching Fund Grant for the expenses listed in confidential Exhibit A, attached, which are Eligible Expenses under Section 7.4 of the

## **CABLE HUSTON**

September 29, 2019 Page 2

Amended IFA. These expenses are in excess of any amounts recovered through Issue Fund Grants and/or other Matching Fund Grant Requests.

3. A Preauthorized Matching Fund Grant may be provided only if AWEC demonstrates that it has used in-house resources or outside funding for at least 35% of the Eligible Expenses for Eligible Proceedings. Amended IFA at Section 7.2. As shown in confidential Exhibit A, AWEC has used in-house resources and outside funding for at least 35% of the Eligible Expenses in these proceedings.

4. AWEC is the successor to the Northwest Industrial Gas Users, which became precertified as eligible to receive intervenor funding grants under Section 5.2 of the original Intervenor Funding Agreement pursuant to Order No. 04-055, entered by the Commission on February 3, 2004. Under the current version of the IFA, funds from NW Natural's Preauthorized Matching Fund Account are available for use exclusively by AWEC. Amended IFA at Section 4.2.2.

Having demonstrated that it meets all of the criteria and conditions for such request, AWEC requests payment of a Preauthorized Matching Fund Grant from NW Natural's Preauthorized Matching Fund in the amount of \$40,348.95. AWEC requests that the Commission grant this request within 30 days of receipt and order NW Natural to pay AWEC the amount of \$40,348.95 within 30 days after receipt of the Commission directive, in accordance with Section 7.2 of the Amended IFA.

Payment should be sent to the following address:

Alliance of Western Energy Consumers 818 SW Third Avenue #266 Portland, OR 97204

Thank you, and please do not hesitate to contact me if you have any questions.

Very truly yours,

all Ar

Chad M. Stokes Counsel for Alliance of Western Energy Consumers

CMS:bh Enclosure cc: Ed Finklea (via e-mail)