



CHAD M. STOKES  
ADMITTED IN OREGON AND WASHINGTON

[cestokes@cablehuston.com](mailto:cestokes@cablehuston.com)  
[www.cablehuston.com](http://www.cablehuston.com)

September 27, 2019

**VIA FIRST CLASS AND ELECTRONIC MAIL**

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

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

Dear Ms. Davis:

Alliance of Western Energy Consumers (“AWEC”) files this request for payment of a Preauthorized Matching Fund Grant for costs incurred from January 1, 2019 through August 31, 2019 from the Northwest Natural Gas Company (“NW Natural”) Preauthorized Matching Fund Account in the amount of \$10,202.07. 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. 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 2019, as demonstrated by the following:

1. Under the Amended IFA, NW Natural makes available an Annual Grant Amount of \$72,738, 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 UG 344 (Phase II), UM 1909, UM 1929, UM 2004, LC 71, and Advice 19-04 as Eligible Proceedings from January 1, 2019 through August 31, 2019. AWEC requests the payment of the \$10,202.07 Preauthorized Matching Fund Grant for the expenses listed in confidential Exhibit A, attached, which are Eligible Expenses under Section 7.4 of the Amended IFA. These expenses are in excess of any

September 29, 2019

Page 2

---

- 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 \$10,202.07. AWEC requests that the Commission grant this request within 30 days of receipt and order NW Natural to pay AWEC the amount of \$10,202.07 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,



Chad M. Stokes  
Counsel for Alliance of Western Energy Consumers

CMS:bh

Enclosure

cc: Ed Finklea (via e-mail)