

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1654

In the Matter of)	
)	
NORTHWEST NATURAL GAS)	JOINT MOTION SEEKING
COMPANY, dba NW NATURAL)	APPROVAL TO FILE INTERVENOR
)	FUNDING GRANT REQUEST AND
Investigation of Interstate Storage and)	BUDGET
Optimization Sharing)	
)	

1 Pursuant to OAR 860-001-0120 and the Third Amended and Restated Intervenor Funding
2 Agreement (IFA), approved in Order No. 15-335 (Oct. 20, 2015), the Oregon Citizens’ Utility
3 Board (CUB) and the Northwest Industrial Gas Users (NWIGU) hereby request that the Public
4 Utility Commission of Oregon (the Commission) allow the filing of an Intervenor Funding Grant
5 and Budget in the above captioned docket.

6 UM 1654 was opened on May 13, 2013 to consider whether, at the time, the current
7 sharing arrangement for NW Natural Gas Company’s (NW Natural or the Company) interstate
8 storage and optimization activities should be revised.¹ While the Commission held that the
9 sharing arrangement in place at the time should be maintained, it ordered the Company to
10 conduct a cost study to determine with greater clarity how costs are generated and shared.² In
11 doing so, the Commission determined that a neutral third party should conduct an evaluation and
12 cost allocation study of NW Natural’s optimization activities, the assets being utilized for those

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.*

1 activities, the allocation between regulated and unregulated services, and the various components
2 of NW Natural’s system that drive the costs and revenues associated with interstate storage
3 services.³ The Commission directed the UM 1654 parties to form a steering committee to
4 develop the third party contract, develop and articulate the elements of the study, interview and
5 hire the third party, and oversee the contractor’s work.⁴

6 At this time, the members of the steering committee—comprised of Commission Staff,
7 CUB, NWIGU, and NW Natural—have collaborated to select a third party contractor to conduct
8 the work contemplated in Order No. 15-066. The steering committee selected the Liberty
9 Consulting Group of Lebanon, Pennsylvania to perform the work, and has begun preliminary
10 orientation, scoping, chronology, and data collection for the ongoing project.

11 CUB and NWIGU appreciate the fact that ongoing work subsequent to a final
12 Commission order renders the procedural status and timing of this motion to be somewhat
13 atypical. Given that there has been no prehearing conference, and the current work is an
14 extension of an existing docket, CUB and NWIGU have not had an opportunity to either set
15 deadlines for Intervenor Funding Grants or Budgets or outline other procedural aspects of
16 intervenor funding in this phase of the proceeding. CUB and NWIGU respectfully request
17 permission to file intervenor funding budgets outside of the typical time period contemplated in
18 the IFA. Since the subsequent work to be conducted arises directly out of UM 1654 and Order
19 No. 15-066, CUB and NWIGU ask that the Commission allow each individual organization to
20 separately file Intervenor Funding Grant and Budget requests to cover the extended activities in
21 this docket.

³ *Id.* at 5.

⁴ *Id.* at 6.

DATED this 26th day of April, 2017.

Respectfully submitted,



Michael P. Goetz, OSB #141465
Staff Attorney
Oregon Citizens' Utility Board
610 SW Broadway, Ste. 400
Portland, OR 97205
(503) 227-1984 phone
(503) 224-2596 fax
mike@oregoncub.org

/s/ Tommy A. Brooks_____

Tommy A. Brooks, OSB No. 076071
Cable Huston
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-Mail: com tbrooks@cablehuston.com
Of Attorneys for the
Northwest Industrial Gas Users