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September 30, 2013

**VIA ELECTRONIC FILING
& FIRST CLASS MAIL**

Oregon Public Utility Commission
Attn: Filing Center
550 Capitol Street, N.E., #215
P.O. Box 2148
Salem, Oregon 97308-2148

**Re: *In the Matter of Northwest Natural Gas Company
Mechanism for Recovery of Environmental Remediation Costs***
Docket No. UM 1635

Dear Filing Center:

Enclosed for filing in the above-referenced matter, please find an original and one (1) copy of the **Request for Payment of Issue Fund Grant of the Northwest Industrial Gas Users**. Please note Exhibit A to the Request is Confidential and should not be posted to the Commission website. The confidential Exhibit will only be provided via mail to the Commission and to NW Natural.

A copy of the attached, without the confidential exhibit, will be served on the current Service List via e-mail and/or first class mail.

Thank you for your assistance, and please do not hesitate to contact our office with any questions.

Very truly yours,



Tommy A. Brooks

cc: UM 1635 Service List (via e-mail and/or first class mail)

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1635

In the Matter of)	
)	REQUEST FOR PAYMENT OF ISSUE
NORTHWEST NATURAL GAS)	FUND GRANT OF THE NORTHWEST
COMPANY)	INDUSTRIAL GAS USERS
)	
Mechanism for Recovery of)	
Environmental Remediation Costs)	

Pursuant to Section 7.3 of the Second Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) in Order No. 12-452 (November 20, 2012), Northwest Industrial Gas Users (“NWIGU”) hereby requests payment of NWIGU’s Issue Fund Grant in Docket No. UM 1635 in the amount of \$20,000.00. In support of this Request, NWIGU shows the following:

1. On December 18, 2012, NWIGU filed a Notice of Intent to Request an Issue Fund Grant in this docket. On April 12, 2013, NWIGU submitted a proposed budget in the amount of \$25,000.00 less in-house resources of 20 percent, for a total of \$20,000.00. The Commission approved an Issue Fund Grant for NWIGU in the amount of \$20,000.00 on April 22, 2013. *In the Matter of Northwest Natural Gas Company*, OPUC Docket No UM 1635, Order No. 13-143.

2. NWIGU hereby requests that the Commission authorize payment of the Issue Fund Grant in this docket in the amount of \$20,000.00. NWIGU’s Eligible Expenses for this proceeding from January 1, 2013 through June 30, 2013, are shown in Confidential Attachment A.

3. NWIGU respectfully submits that this request for payment satisfies the requirement of IFA Section 7.4 as follows:

Section 7.3(a) - The itemized expenses, payees and hourly rates are attached as Confidential Attachment A.

Section 7.3(b) - NWIGU is a full and active participant in this docket. NWIGU participated in workshops, participated in informal meetings and telephone conferences with NW Natural, its consultants, Staff and CUB, filed testimony through its own Expert Witness Michael C. Deen, participated in settlement workshops and discussions, and negotiated a settlement stipulation. The expenses included in Confidential Attachment A are Eligible Expenses as defined in IFA Section 7.4 and are reasonable and directly attributable to NWIGU's participation in UM 1635 on behalf of all customers.

Section 7.4(c) – NWIGU used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA. In addition NWIGU has supplied substantial resources in this proceeding through its Executive Director's active involvement in addition to the Eligible Expenses set forth on Attachment A, which Attachment reflects only those Eligible Expenses from outside legal counsel at the law firm of Cable Huston Benedict Haagensen and Lloyd, LLP and NWIGU's expert witness, Regulatory & Cogeneration Services.

Section 7.4 – All of the expenses included in Confidential Attachment A are Eligible Expenses as defined in Section 7.4 of the IFA and are consistent with NWIGU's proposed budget in this proceeding. No conditions were placed on NWIGU's Issue Fund Grant in Order No. 13-149.

4. Upon approval of this request for payment by the Commission, NW Natural should send payment to NWIGU as follows (which address is different than NWIGU's mailing address for service):

Edward Finklea
Executive Director
Northwest Industrial Gas Users
P.O. Box 2058
Tualatin, Oregon 97062

5. NWIGU has satisfied the terms of the IFA and respectfully requests that the Commission approve payment of NWIGU's Issue Fund Grant in the amount of \$20,000.00 within 30 days of receiving this Request for Payment as provided in Section 7.6 of the IFA. This Request seeks payment of the entire amount authorized by the Commission in Order 13-149 and constitutes a final Request for Payment of the Intervenor Funding Grant. However, NWIGU has already incurred costs beyond the grant amount proposed and approved by the Commission. This docket is ongoing and, to the extent NWIGU's Eligible Expenses are not covered by this Issue Fund Grant, NWIGU reserves the right to recover these excess Eligible Expenses beyond the 20% match through NW Natural's 2013 Matching Fund Grant.

Dated this 30th day of September 2013.

CABLE HUSTON BENEDICT HAAGENSEN
& LLOYD LLP



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Of Attorneys for the
Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing **REQUEST FOR PAYMENT OF ISSUE FUND GRANT OF THE NORTHWEST INDUSTRIAL GAS USERS** via electronic mail and, where paper service is not waived, via postage-paid first class mail upon the following parties of record:

Citizens Utility Board

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G. Catriona McCracken
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judy.johnson@state.or.us

NWIGU

Edward Finklea
326 Fifth Street
Lake Oswego, OR 97034
efinklea@nwigu.org

Dated in Portland, Oregon, this 30th day of September 2013.



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