

TOMMY A. BROOKS
ADMITTED IN OREGON & WASHINGTON

tbrooks@cablehuston.com www.cablehuston.com

January 20, 2016

VIA ELECTRONIC FILING & FIRST CLASS MAIL

Oregon Public Utility Commission Attn: Filing Center P.O. Box 1088 Salem, Oregon 97308-1088

Re: In the Matter of Northwest Natural Gas Company

Mechanism for Recovery of Environmental Remediation Costs

Docket No. UM 1635

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 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 first class 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
NW NATURAL GAS COMPANY, dba NW NATURAL	FUND GRANT OF NORTHWEST INDUSTRIAL GAS USERS
Mechanism for Recovery of Environmental Remediation Costs.)))

Pursuant to Section 7.3 of the Third Amended and Restated Intervenor Funding Agreement ("IFA") approved by the Oregon Public Utility Commission ("Commission") in Order No. 15-335 (October 20, 2015), Northwest Industrial Gas Users ("NWIGU") hereby requests payment of NWIGU's Issue Fund Grant in Docket No. UM 1635 in the amount of \$13,760. In support of this request, NWIGU shows the following:

- 1. On December 23, 2015, NWIGU filed a Proposed Issue Fund Budget for Phase III of this docket in the amount of \$17,200, less in-house resources of 20 percent, for a total grant request of \$13,760. The Commission approved the Issue Fund Grant in the amount requested on January 4, 2016. *In re Northwest Natural Gas Company, dba NW Natural, Mechanism for Recovery of Environmental Remediation Costs*, OPUC Docket No. UM 1635, Order No. 16-001 (Jan. 4, 2016).
- 2. NWIGU hereby requests that the Commission authorize payment of the Issue Fund Grant in this docket in the amount of \$13,760. NWIGU's Eligible Expenses for this proceeding through December 2015 are shown in Confidential Attachment A.

Page 1 – REQUEST FOR PAYMENT OF ISSUE FUND GRANT OF THE NORTHWEST INDUSTRIAL GAS USERS

NWIGU's actual costs exceeded its proposed budget, but NWIGU seeks only those

amounts approved by the Commission.

3. NWIGU respectfully submits that this request for payment satisfies the

requirement of IFA Section 7.3 as follows:

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

Confidential Attachment A.

Section 7.3(b) - NWIGU was a full and active participant in this docket. NWIGU

and its consultants participated in discovery in this proceeding, participated in

workshops, participated in informal meetings and telephone conferences with NW

Natural, its consultants, Staff and CUB, and participated in settlement workshops

and discussions. 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 7.3(c) – The only condition of the Issue Fund Grant is that NWIGU must

contribute 20% of Eligible Expenses using in-house resources. NWIGU used its

own funds to pay for at least 20% of the Eligible Expenses as required by Section

6.5 of the IFA. Further, 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.

Section 7.3 (d) – This request is a request for final payment.

Page 2 – REQUEST FOR PAYMENT OF ISSUE FUND GRANT OF THE NORTHWEST INDUSTRIAL GAS USERS

CABLE HUSTON, LLP 1001 SW FIFTH AVENUE, SUITE 2000 PORTLAND, OREGON 97204-1136 TELEPHONE: (503) 224-3092, FACSIMILE: (503) 224-3176 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.

5. Upon approval of this request for payment by the Commission, NW Natural should send payment to NWIGU as follows:

Edward Finklea Executive Director Northwest Industrial Gas Users 545 Grandview Drive Ashland, Oregon 97520

6. 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 \$13,760 from the NW Natural Issue Fund within 30 days of receiving this Request for Payment as provided in Section 7.6 of the IFA.

Dated this 20th day of January 2016.

CABLE HUSTON LLP

Chad M. Stokes, OSB No. 004007

Tommy A. Brooks, OSB No. 076071

1001 SW 5th Avenue, Suite 2000

Portland, OR 97204

Telephone: (503) 224-3092

Facsimile: (503) 224-3176

E-Mail: cstokes@cablehus

cstokes@cablehuston.com

tbrooks@cablehuston.com

Of Attorneys for the

Northwest Industrial Gas Users

Page 3 – REQUEST FOR PAYMENT OF ISSUE FUND GRANT OF THE NORTHWEST INDUSTRIAL GAS USERS