

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1722**

In the Matter of	)	
	)	
PUBLIC UTILITY COMMISSION OF	)	REQUEST FOR FINAL PAYMENT OF
OREGON,	)	THE CITIZENS' UTILITY BOARD OF
	)	OREGON
	)	
Investigation into Recovery of Safety Costs	)	
by Natural Gas Utilities.	)	
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Pursuant to Section 7.3 of the Third Amended and Restated Intervenor Funding Agreement (“Agreement”), which was adopted in Order No. 15-335, the Citizens’ Utility Board of Oregon (“CUB”) submits this request for a final payment in the amount of \$18,500 of eligible expenses in docket UM 1722 from the: 2016 Avista Utilities (“Avista”) issue fund, the 2016 Cascade Natural Gas Co. (“Cascade”) issue fund, and the 2016 Northwest Natural Gas Co. (“NW Natural”) issue fund. CUB is automatically pre-certified under Section 5.2 of the Agreement.

On December 23, 2015, CUB submitted a proposed issue fund grant of \$15,000, to be split evenly between the 2016 Avista issue fund, the 2016 Cascade issue fund, and the 2016 NW Natural issue fund. On January 4, 2016, in Order No. 16-002, the Commission approved CUB’s budget.

On July 25, 2016, CUB proposed to amend its budget in docket UM 1722. CUB estimated total eligible expenses to be \$30,000 and requested a total issue fund grant of \$24,000 with the \$24,000 split evenly between the 2016 Avista issue fund, the 2016 Cascade issue fund and the 2016 NW Natural issue fund.

On July 26, 2016, in Order No. 16-278, the Commission approved CUB’s amended budget.

Under Section 7.3 of the Agreement, each Issue Fund Grant Request for Payment must:

- (a) *Itemize the expenses, payees and hourly rates for amounts to be reimbursed;*
- (b) *Demonstrate that the expenses are reasonable and are directly attributable to issues and positions pursued on behalf of a particular customer class and consistent with the intervenor’s proposed budget;*
- (c) *Provide information sufficient to show that the intervenor has complied with any condition or requirement of the Issue Fund Grant, including, but not limited to, documentation sufficient to show that the intervenor has satisfied the matching fund requirement (i) set forth in Section 6.5 above or (ii) as the Commission may establish as a reasonable condition on Issue Fund Grants, whichever applies; and*
- (d) *Specify whether the request for payment is for a final payment or final payment in full and indicate whether any approved budget amount may be released back to the applicable Issue Fund because the intervenor does not intend to request payment for the full approved budget amount.*

(a) Confidential Attachment A contains a summary of CUB’s expenses to date in this case. Confidential

Attachment B provides a list of CUB activities by date and Intervenor Funding Task Category, as well as CUB's mailing and travel expenses to date. Confidential Attachment C breaks out each CUB staff member's time by Intervenor Funding Task Category to date.

- (b) The expenses incurred are reasonable and directly attributable to the issues and positions CUB is addressing in UM 1722 on behalf of residential customers. In support of this assertion, we supply Confidential Attachments A, B, and C which can be compared to CUB's Issue Fund Budget in this case.
- (c) CUB has satisfied the matching fund requirement as demonstrated in Confidential Attachment A, the summary of CUB's expenses.
- (d) This is a request for a final payment.
- (e) In this filing, CUB requests final payment of our costs in UM 1722 amounting to \$18,500. While our original and amended budgets allocated the costs equally between the three utilities, CUB is proposing a different allocation for our final recovery of costs. Our proposed allocation reflects NWN's significantly larger customer base than the other two utilities, and it also takes into consideration that Avista's and Cascade's 2016 issue funds are nearly depleted. CUB is proposing that the costs be divided up in the following manner:
  - NWN 2016 Issue Fund: \$8,000
  - Avista 2016 Issue Fund: \$5,250
  - Cascade 2016 Issue Fund: \$5,250

In addition, CUB will release the remaining \$2,750 each to the 2016 Cascade and Avista Issue Funds.

CUB discussed this proposal with NW Natural on December 15, 2016, and NW Natural agrees with this allocation.

See Confidential Attachment A, CUB Expense Summary. The attached documents should allow the Commission to track the time spent on the elements of the case, and we believe that this filing meets the requirements of the Commission.

Respectfully submitted,  
December 15, 2016



Bob Jenks  
Executive Director  
Citizens' Utility Board of Oregon

Enc. Attachments A, B and C

cc. David Meyer, Avista  
Mark Thompson, NW Natural  
Michael Parvinen, Cascade