

H

# CABLE HUSTON<sub>LLP</sub>

TOMMY A. BROOKS  
ADMITTED IN OREGON & WASHINGTON

[tbrooks@cablehuston.com](mailto:tbrooks@cablehuston.com)

July 25, 2016

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 PUBLIC UTILITY COMMISSION OF OREGON Investigation into  
Recovery of Safety Costs by Natural Gas Utilities (UM 1722)

Dear Filing Center:

Attached please find Northwest Industrial Gas Users' revised Request for Partial Payment of Issue Fund Granted dated July 25, 2016. This pleading will replace the pleading NWIGU filed on July 15, 2016 as an error was discovered in the amount of the Issue Fund Grant on the pleading only.

Confidential Exhibit A will not be re-filed and was correct as initially submitted.

Very truly yours,



Tommy A. Brooks

TAB:sk

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1722**

In the Matter of	)	
	)	
PUBLIC UTILITY COMMISSION OF	)	NORTHWEST INDUSTRIAL GAS
OREGON,	)	USERS' REQUEST FOR PARTIAL
	)	PAYMENT OF ISSUE FUND GRANT
Investigation into Recovery of Safety Costs by	)	
Natural Gas Utilities	)	

---

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 partial payment of NWIGU’s Issue Fund Grant in Docket No. UM 1722 in the amount of \$16,744.38 with \$5,581.46 paid from each of the Issue Funds for Avista, Cascade, and NW Natural. In support of this request, NWIGU shows the following:

1. On December 23, 2015, NWIGU submitted a proposed budget in the amount of \$30,000.00 less in-house resources of 20 percent, for \$24,000.00. The Commission approved the Issue Fund Grant for NWIGU in that amount on January 4, 2016. *In the Matter of Public Utility Commission of Oregon Investigation into Recovery of Safety Costs by Natural Gas Companies*, OPUC Docket No. UM 1722, Order No. 16-003 (Jan 04, 2016). The Commission approved one-third of that amount for each of the Issue Funds for Avista, Cascade and NW Natural.

2. NWIGU hereby requests that the Commission authorize partial payment of the Issue Fund Grant in this docket in the amount of \$16,744.38. NWIGU’s Eligible

Expenses for this proceeding through June 30, 2016 are shown in Confidential Attachment A.

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 is a full and active participant in this docket. NWIGU and reviewed discovery in this proceeding, participated in workshops, participated in informal meetings and telephone conferences with the PUC, participated in settlement discussions, and filed testimony in this proceeding. 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 1722 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 LLP.

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. 16-003.

4. Upon approval of this request for payment by the Commission, Avista Corporation, Cascade Natural Gas Corporation and Northwest Natural Gas should each send payment of \$5,581.46 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 163  
Ashland, OR 97520

5. NWIGU's request relates only to expenses incurred through June 30, 2016. NWIGU requests that the Commission approve this payment as a progress payment, and NWIGU will seek payment for the remainder of the funds within the approved revised budget when this matter concludes.

Dated this 25<sup>th</sup> day of July 2016.

CABLE HUSTON, LLP



---

Chad M. Stokes, OSB No. 004007  
Tommy A. Brooks, OSB No. 076071  
1001 SW 5<sup>th</sup> Avenue, Suite 2000  
Portland, OR 97204  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
E-Mail: [cstokes@cablehuston.com](mailto:cstokes@cablehuston.com)  
[tbrooks@cablehuston.com](mailto:tbrooks@cablehuston.com)  
Of Attorneys for the  
Northwest Industrial Gas Users