

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1722, UG 286**

In the Matters of

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

and

NORTHWEST NATURAL GAS  
COMPANY dba NW NATURAL,  
Request to Continue Schedule 177, the  
System Integrity Program Recovery  
Mechanism (UG 286)

NORTHWEST INDUSTRIAL GAS  
USERS' NOTICE OF INTENT TO  
REQUEST ISSUE FUND GRANT

and Waiver of Paper Service

Pursuant to OAR § 860-001-0120 and the Second Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 12-452 on November 20, 2012, the Northwest Industrial Gas Users (“NWIGU”) hereby respectfully submit this Notice of Intent to Request an Issue Fund Grant in Docket Nos. UM 1722, UG 286. As required by the IFA, NWIGU asserts the following:

1. UM 1722, UG 286 are Eligible Proceedings under the IFA. The IFA defines an Eligible Proceeding as “any Commission proceeding that directly affects one or more of the Participating Public Utilities.” IFA, Section 1(c). UM 1722 and UG 286 will directly affect Northwest Natural Gas Company (“NW Natural”), Avista Utilities (“Avista”) and Cascade Natural Gas Corporation (“Cascade”), all Participating Public Utilities under Section 1(k) of the IFA. Therefore, an Issue Fund Grant is permissible under Section 6.1 of the IFA.

2. As required by IFA Section 6.2, this Notice of Intent is being served on each affected Participating Public Utility, all pre-certified organizations, and all parties identified on the service list for UM 1722, UG 286.

3. NWIGU identifies the NW Natural, the Avista and Cascade Issue Fund Account as the accounts from which NWIGU intends to request an Issue Fund Grant. The amount of the request will depend on the availability of funds in that account when NWIGU submits a budget.

4. NWIGU has been precertified under Section 5.2 of the IFA and OAR § 860-001-0120(3) as eligible to receive an Issue Fund Grant.

5. NWIGU will submit a budget in accordance with Section 6.3 of the IFA. NWIGU will also coordinate with the Citizens' Utility Board of Oregon.

Dated this 2<sup>nd</sup> day of April 2015.

Respectfully submitted,



---

Chad M. Stokes, OSB No. 004007  
Tommy A. Brooks, OSB No. 076071  
Cable Huston LLP  
1001 SW Fifth Ave., Suite 2000  
Portland, OR 97204-1136  
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  
Northwest Industrial Gas Users