

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 347

In the Matter of)	
CASCADE NATURAL GAS CORPORATION,)	AMENDED REQUEST FOR PAYMENT OF ISSUE FUND GRANT OF ALLIANCE OF WESTERN ENERGY CONSUMERS
Request for a General Rate Revision.)	
)	

Pursuant to Section 7.3 of the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Public Utility Commission of Oregon (“Commission”) in Order No. 18-017 (January 17, 2018), Alliance of Western Energy Consumers (“AWEC”) hereby submits this Amended Request for Payment of AWEC’s Issue Fund Grant (“Amended Request”) in Docket No. UG 347 in the amount of \$32,465.26, which is less than the full amount authorized. AWEC’s original Request for Payment of Issue Fund Grant, dated March 28, 2019, contained an error and should be replaced with this Amended Request. In support of this Amended Request, AWEC shows the following:

1. On August 13, 2018, AWEC, f/k/a Northwest Industrial Gas Users (“NWIGU”), filed a Proposed Issue Fund Budget in the amount of \$62,625 less in-house resources of 20 percent, for a total grant request of up to \$50,100. However, the uncommitted balance in Cascade’s Issue Fund Account was only \$34,500 at the time, resulting in a maximum issue fund grant in that amount. The Commission approved the Issue Fund Grant in the amount of \$34,500 on August 16, 2018. *In the Matter of Cascade Natural Gas Corporation, Request for a General Rate Revision*, OPUC Docket No. UG 347, Order No. 18-302 (August 16, 2018).

2. After engaging in discovery, filing detailed testimony, and multiple settlement conferences, the parties were able to settle this proceeding on all but a few issues that will be decided in other proceedings. AWEC hereby requests that the Commission authorize payment of the approved Issue Fund Grant in this docket in the amount of \$32,465.26, which is less than the full amount authorized. AWEC's Eligible Expenses for this proceeding through February 2019 are shown in Confidential Attachment A.

3. AWEC 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) - AWEC was a full and active participant in this docket. AWEC and its consultants participated in discovery in this proceeding, participated in informal meetings and telephone conferences with Cascade, Staff, and/or CUB, and participated in settlement workshops and discussions, as well as drafting testimony, editing the stipulation and joint testimony in support of the 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 AWEC's participation in UG 347 on behalf of all customers.

Section 7.3(c) - The only condition of the Issue Fund Grant is that AWEC must contribute 20% of Eligible Expenses using in-house resources. AWEC used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA.

Section 7.3 (d) – This request is a request for final payment of the approved issue fund in this docket.

4. 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 AWEC’s proposed budget in this proceeding.

5. Upon approval of this request for payment by the Commission, Cascade should send payment to AWEC as follows:

Alliance of Western Energy Consumers
818 SW Third Avenue #266
Portland, OR 97204

6. AWEC has satisfied the terms of the IFA and respectfully requests that the Commission approve payment of AWEC’s Issue Fund Grant in the amount of \$32,465.26, from the Cascade Issue Fund within 30 days of receiving this Amended Request as provided in Section 7.6 of the IFA. With this payment, there will be \$2,036.74 in funds remaining in the approved Issue Fund Grant that can be released back to Cascade’s Issue Fund.

Dated this 29th day of March 2019.

CABLE HUSTON LLP



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