

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 76**

In the Matter of	)	
	)	
CASCADE NATURAL GAS	)	REQUEST FOR AN ISSUE FUND
CORPORATION,	)	GRANT & PROPOSED BUDGET OF
	)	THE OREGON CITIZENS' UTILITY
2020 Integrated Resource Plan	)	BOARD

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The Oregon Citizens' Utility Board (“CUB”) hereby requests a grant of \$6,000 from the 2022 Cascade Natural Gas Issue Fund. CUB has been tracking its participation in this docket by hours and activity.

CUB is pre-certified per OAR 860-012-0100(3)(a). LC 76 is an eligible proceeding under the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), as approved by the Oregon Public Utility Commission in Order No. 18-017, entered January 17, 2018. The proceeding directly affects Cascade Natural Gas Corporation, which is a participating utility under the IFA. See IFA at Article 1(n). The IFA defines an eligible proceeding for Issue Funds in part as “an Integrated Resource Plan.” IFA at Article 1(c)(iii).

Article 6.2 of the IFA requires an intervenor seeking an Issue Fund Grant to file a Notice of Intent to Request an Issue Fund Grant. CUB filed its Notice of Intent to Request an Issue Fund Grant on December 22, 2022.

Article 6.3 of the IFA requires an intervenor seeking an Issue Fund Grant to file its proposed budget “30 days after the prehearing conference at which the schedule for the proceeding is established or by such other date as the Commission designates.” CUB respectfully requests a waiver of this requirement of the IFA.

Pursuant to paragraph 6.3 of the IFA, the proposed budget must identify certain points of information. CUB provides the information below.

*(a) Statement of Work to be Performed.:* CUB intends to participate in every procedural aspect of this case. CUB will participate in the prehearing conference and participate in all workshops and settlement conferences. CUB will review and analyze the testimony filed in this docket and file testimony of its own. CUB will pursue discovery of Cascade Natural Gas through data requests and will respond to data requests asked of us. CUB intends to file briefs and participate in any hearings in this proceeding, if appropriate.

*(b) Description of Areas to be Investigated:* CUB is investigating issues including, but not limited to:

- Proposed capital investments;
- Projected load growth and resource balance; and
- Issues raised by other parties.

*(c) Description of the Class or Classes Benefitting from CUB's Participation:* CUB represents the interests of Cascade Natural Gas's residential customers, though other customer classes may benefit from many aspects of our participation.

*(d) The Fund from Which CUB Seeks an Issue Fund Grant & Available Funds:* CUB is seeking a \$6,000 grant from the 2022 Cascade Natural Gas Issue Fund.

*(e) The Budget Showing Estimated Fees and Costs:* CUB's budget accompanies this document as Attachment A.

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*(f) A Representation of the use of matching funds:* The budget and an accounting for the use of matching funds accompany this document as Attachment A.

Dated this 22<sup>nd</sup> day of December, 2022.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael P. Goetz".

Michael P. Goetz, OSB #141465  
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## Attachment A

### CUB Proposed Budget - LC 76

<b>CUB Internal Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
<i>Staff</i>			
Bob Jenks, Executive Director	\$350	6.00	\$2,100.00
Michael Goetz, General Counsel	\$325	4.00	\$1,300.00
Jennifer Hill-Hart, Policy Manager	\$325	3.50	\$1,137.50
Kate Ayres, Policy Advocate	\$225	0.00	\$0.00
Thomas Jerin, Operations Manager	\$180	5.00	\$900.00
Will Gehrke, Economist	\$300	0.00	\$0.00
Utility Analyst	\$275	7.50	\$2,062.50
 <i>Other Expenses</i>			
Travel			
<b>SubTotal</b>			<b>\$7,500.00</b>
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<b>In-House Resources</b>			
20% of Eligible Expenses			\$1,500
<b>Total</b>			<b>\$6,000</b>