

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UG 435 & UG 411

IN THE MATTER OF:	)	
	)	
NORTHWEST NATURAL GAS	)	REQUEST FOR PAYMENT
COMPANY, dba NW NATURAL	)	OF SMALL BUSINESS
	)	UTILITY ADVOCATES
Request for General Rate Revision (UG	)	
435), and	)	
	)	
Advice 20-19, Schedule 198 Renewable	)	
Natural Gas Recovery Mechanism (ADV	)	
1215) (UG 411)	)	
_____	)	

**1. INTRODUCTION**

Comes now Small Business Utility Advocates (“SBUA”) pursuant to the Oregon Public Utility Commission (“Commission”) Order 22-507 dated December 30, 2023 and the Fourth Restated and Amended Intervenor Funding Agreement, adopted by the Commission in Order 18-017 (“IFA”), to submit this Issue Fund Grant Request for Payment (“Request”) in the above-referenced matter asking the Commission to order payment of the Issue Fund grant funds referenced herein. IFA 7.3. SBUA requests this assistance for representing the small commercial customers of Northwest Natural Gas Company (“Company”), that is, those customers taking services under the Company’s Rate Schedule 3 Basic Firm Sales Service—Non Residential (“RS3”). Documentation required pursuant to IFA 7.3 and Order 22-507 is confidential and submitted under seal with this Request as UG 435 SBUA Confidential Fax.

## **2. REQUEST**

Pursuant to IFA 7.3(a) the expenses, payees and hourly rates for amounts to be reimbursed including billing details and including separately identified amounts for consultant or expert witness fees are submitted here in as Confidential Exhibit A. SBUA requests payment in addition to reimbursement where the documented contribution to be reimbursed is only 45% of the cost of the representation and the approved Amended Proposed Budget.

Pursuant to IFA 7.3(b) all the expenses requested for payment are reasonable and are directly attributable to issues and positions pursued on behalf of the RS3 customers including the general rate case and the rate spread of deferred amounts attributable to costs of COVID-19 deferral for 2020 and 2021, and are consistent with the Amended Proposed Budget submitted by SBUA in this docket on August 24, 2022. As identified in the Amended Proposed Budget SBUA participated in all aspects of the docket including discovery, settlement negotiations, briefing, and oral argument.

Pursuant to IFA 7.3 generally and 7.3(c) SBUA includes confidential documentation submitted herein as SBUA Confidential Exhibit A to show SBUA has satisfied at least the matching fund requirement of 20% set forth in IFA Section 6.5.<sup>1</sup>

Pursuant to IFA 7.3(d) this Request is for final payment in full.

## **3. REPORTING**

Pursuant to IFA 6.8(a) SBUA anticipates reporting as described in this provision even though the reporting would be in the term of the Fifth Restated and Amended Intervenor Funding

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<sup>1</sup> The IFA section 7.3 states “6.6”.

Agreement as adopted by the Commission in Order 22-506 approving the UM 2264 Fifth Amended and Restated Intervenor Funding Agreement.

#### **4. CONCLUSION**

The Commission should grant this Request pursuant to the IFA and as this Request provides the information required for assisting SBUA's representation of the Company's RS3 customers in this rate case that also includes the allocation of deferred 2020 and 2021 costs of COVID-19 pandemic. If additional information is required, SBUA requests permission to supplement this Request with responsive material, which material would be promptly provided.

RESPECTFULLY SUBMITTED January 20, 2023.



s/ Diane Henkels

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