

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 435 AND UG 411

In the Matter of NW NATURAL GAS)	
COMPANY D/B/A NW NATURAL)	REQUEST FOR PAYMENT OF NW
)	NATURAL ISSUE FUND GRANT OF
Request for a General Rate Revision)	ALLIANCE OF WESTERN ENERGY
(UG 435), and)	CONSUMERS
)	
Advice 20-19, Schedule 198 Renewable)	
Natural Gas Recovery Mechanism)	
(ADV 1215) (UG 411).)	
_____)	

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 requests payment of AWEC’s Issue Fund Grant in consolidated Docket Nos. UG 435 and UG 411 in the amount of \$96,000. In support of this request, AWEC states the following:

1. On December 17, 2021, Northwest Natural Gas Company (“NW Natural”) filed its request for a general rate revision. On December 20, 2021, AWEC intervened in UG 435 and provided its Notice of Intent to Request an Issue Fund Grant. On January 26, 2021, the Commission consolidated UG 411 with UG 435, concerning NW Natural’s proposed renewable natural gas recovery mechanism (“AAC”).

2. On February 4, 2022, AWEC filed a Proposed Issue Fund Budget in these dockets in the amount of \$120,000.00, less in-house resources of 20 percent, for a total Issue Fund Grant request of \$96,000.00. The Commission approved the Issue Fund Grant in the amount of \$96,000.00 on February 8, 2022, finding that “In light of the issues being addressed, the complexity of the issues and the significant policy decisions

to be made, the Commission believes that AWEC's proposed budget is reasonable and should be approved.” *In the Matter of Northwest Natural Gas Company dba NW Natural, Request for a General Rate Revision*, OPUC Docket No. UG 435, Order No. 22-028 (Feb 08, 2022).

3. These consolidated proceedings involved NW Natural’s original request to increase Oregon revenues by approximately \$73.5 million, which equated to a 16.5% margin rate increase. On March 7, 2022, however, NW Natural filed an erratum, which increased the overall revenue requirement by \$4.5 million to \$78.0 million. In the amended filing, NW Natural explained that it had inadvertently excluded certain transportation equipment from rate base in its initial filing. The Commission also consolidated UG 411 with UG 435, NW Natural’s proposed AAC for renewable natural gas investments under SB 98.

4. These proceedings involved complicated topics and significant policy issues, including NW Natural’s proposed \$78 million revenue requirement, NW Natural’s erratum filing, cost of capital, including capital structure, the cost of debt and return on equity, NW Natural’s COVID 19 deferral amortization and rate spread, the AAC, the cost recovery and rate spread of NW Natural’s first RNG project, long run incremental cost study and rate spread issues, Senate Bill 98 and Climate Protection Plan issues.

5. AWEC participated in numerous settlement conferences and calls, issued and reviewed discovery, filed opening and rebuttal testimony and exhibits, filed joint testimony on rate of return with CUB, and negotiated three separate settlement stipulations and filed testimony or briefs in support of the stipulations. AWEC also filed two briefs and participated in oral argument. AWEC hereby requests that the

Commission authorize the approved Issue Fund Grant in this docket in the amount of \$96,000.00. AWEC's Eligible Expenses for this proceeding through August 2022 are shown in **Confidential Exhibit A**.

6. 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 these consolidated dockets. AWEC issued and reviewed discovery, filed testimony, rebuttal testimony, joint testimony on rate of return with CUB, and reviewed the testimony of other parties, participated in multiple settlement conferences and calls, negotiated three settlement stipulations and filed testimony in support of the stipulations. AWEC also participated in Oral Argument and filed two briefs. 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 435 and UG 411 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 Grant in this docket.

7. 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.

8. Upon approval of this request for payment by the Commission, NW Natural should send payment to AWEC as follows:

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

9. 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 \$96,000.00 from the NW Natural Issue Fund within 30 days of receiving this Request for Payment as provided in Section 7.6 of the IFA.

10. AWEC’s expenses and costs exceeded its estimated budget in these consolidated dockets. With this payment, there will be no funds remaining in the approved Issue Fund Grant, and AWEC will seek the remainder of its fees and expenses through Matching Funds.

Dated this 22nd day of September, 2022.

CABLE HUSTON LLP



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