



CHAD M. STOKES
ADMITTED IN OREGON AND WASHINGTON

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June 9, 2023

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, #100
Salem, Oregon 97301

Re: In the Matter of NW Natural's Renewable Natural Gas Adjustment Mechanism- Dakota City (Docket No. UG 462)
Proposed Issue Fund Budget of the Alliance of Western Energy Consumers

Dear Filing Center:

Pursuant to OAR 860-001-0120 and the Fifth Amended and Restated Intervenor Funding Agreement ("IFA"), approved by the Public Utility Commission of Oregon ("Commission") in Order No. 22-506 (December 29, 2022) Alliance of Western Energy Consumers ("AWEC") hereby respectfully submits an Issue Fund Budget of \$45,000 which after 20 percent match by AWEC of \$9,000, would result in a maximum net requested Issue Fund Grant of \$36,000. To the extent AWEC's actual costs exceed the maximum Issue Fund Grant amount, AWEC will seek Matching Funds. AWEC has coordinated this request with the request made by Oregon Citizens' Utility Board ("CUB").

Article 6.3 of the IFA provides that precertified intervenors seeking an Issue Fund Grant must submit a proposed budget to the Commission. Accordingly, AWEC has attached a detailed budget as Appendix A. AWEC's proposed budget is based on AWEC's full participation in this proceeding, including time and expenses that have already been incurred to date.

The IFA also requires the following information:

1. A Statement of the Work to be Performed.

AWEC has participated and will continue to participate in all stages of this proceeding. This includes: (a) a review of the initial filing and testimony of NW Natural Gas Company ("NW Natural"); (b) drafting discovery and reviewing discovery responses; (c) drafting testimony and reviewing the testimony of other parties; (d) drafting briefs and reviewing briefs of other parties; (e) participating in settlement conferences; and (f) participating in the evidentiary hearing. AWEC has retained a consultant to assist legal counsel in this proceeding.

2. A Description of the Areas to be Investigated.

AWEC has and will focus on all aspects of NW Natural's Dakota renewable natural gas project. This includes a review and analysis of: (a) the Dakota Project; (b) corporate and tax issues; (c) the Investment Tax Credit; (d) production risk; (e) CPP related issues; (d) the appropriate return for developers and the allocation of risks; and (e) how to allocate the costs of the project.

3. A Description of the Particular Customer Class(es) That Will Benefit from the Intervenor's Participation.

AWEC is a nonprofit association of end users of natural gas with major facilities in the states of Oregon, Washington, and Idaho. AWEC's gas members include diverse industrial and commercial interests, including food processing, pulp and paper, wood products, electric generation, aluminum, steel, chemicals, electronics, and aerospace. AWEC members take service from local distribution companies under industrial rate schedules. Accordingly, AWEC's advocacy will benefit the industrial rate class.

4. Identification of the Specific Fund Accounts from Which the Intervenor is Seeking Monies.

AWEC identifies the NW Natural Issue Fund Account as the account from which AWEC is seeking monies. As of the date of this submittal, the uncommitted balance of that fund is \$151,473. To the extent AWEC incurs costs that exceed its request, it will seek matching funds.

5. A Budget Showing Estimated Attorney, Consultant and Expert Witness Fees, Which May Include the Cost for Appropriate Support Staff and Operations Support.

AWEC has attached a detailed budget for AWEC's participation in this proceeding as Appendix A.

6. Representation that Intervenor will use matching funds in the form of either in-house resources or outside funding to account for or pay at least 20 percent of the Eligible Expenses.

AWEC represents that it will use matching funds in the form of either in-house resources or outside funding to account for or pay at least 20 percent of the Eligible Expenses.

CONCLUSION

AWEC respectfully requests that the Commission approve its Issue Fund Budget in the amount of \$45,000. AWEC further requests approval of an Issue Fund Grant in an amount of \$36,000 from 2023 funds in the NW Natural Issue Fund account.

CABLE HUSTON LLP

June 9, 2023

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Should you have any questions regarding this filing, please call.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Chad M. Stokes", with a long horizontal flourish extending to the right.

Chad M. Stokes

APPENDIX A

UG 462
AWEC PROPOSED BUDGET FOR ISSUE FUND

Legal Counsel

<u>Work to be Performed</u>	<u>Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Cost</u>
Review of initial filing and workpapers, draft intervention, draft data requests and review responses to data requests; review discovery and responses from other parties	Partner	9.2	\$325	\$3000
Prepare for and attend settlement Conferences; draft and edit any stipulations	Partner	12.3	\$325	\$4000
Research, draft and edit opening and rebuttal Testimony; review testimony from other parties	Partner	12.3	\$325	\$4000
Research, draft and edit briefs and review briefs filed by other parties	Partner	30.7	\$325	\$10,000
Prepare for and attend evidentiary hearing; prepare for and attend oral argument (if applicable)	Partner	12.3	\$325	\$4,000
Total AWEC Budget for Legal Services				\$25,000
Less 20% Match Using In-house Resources				\$5000
Total AWEC Request for Legal Services				\$20,000

Estimated Expert Witness Budget for Issue Fund Grant

AWEC has retained Brad Mullins to assist with AWEC's analysis in this matter. AWEC may also use other expert witnesses in this proceeding to address other issues.

<u>Personnel</u>	<u>Title</u>	<u>Rate</u>
Bradley Mullins	Consultant	\$244/hour

Review filing, testimony, exhibits, workpapers, assistance with the preparation of data requests; review of the utility's books, records and other relevant materials; analysis of responses to discovery requests and assistance with preparation of additional discovery, preparation of testimony; review and analysis of direct and rebuttal testimony; preparation of final testimony and assistance with preparation for cross-examination; attendance at hearings to testify and assist with cross-examination; assist with preparing the briefs.

Estimated Expert Witness Fees	\$20,000
20 Percent In-House Resources	\$4000
Total AWEC Request for Expert Witness Fees	\$16,000

Total AWEC Issue Fund Budget Request (Legal + Expert)	\$45,000
Total AWEC 20% Match	\$9,000
Total AWEC Issue Fund Grant	(Budget – 20% in-house)
	\$36,000