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August 18, 2006

**VIA ELECTRONIC FILING
& U.S. MAIL**

Oregon Public Utility Commission
PO Box 2148
Salem, OR 97308-2148
Attn: PUC Filing Center

Re: Docket No. AR 499

Dear Filing Center:

Enclosed for filing is an original and one copy of the Northwest Industrial Gas Users' Request for Payment Issue Fund Grant in the above-referenced docket.

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

Respectfully submitted,



Edward A. Finklea
Counsel for
Northwest Industrial Gas Users

EAF/tr

cc: Service List

AR 499

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) THE NORTHWEST INDUSTRIAL
) GAS USERS' REQUEST FOR
) PAYMENT OF ISSUE FUND GRANT
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properly attributable to a utilities regulated operations. Additionally, NWIGU counsel participated in numerous Commission workshops. Expenses related to these activities were reasonably incurred and are directly attributable to the issues and positions pursued on NWIGU's behalf. IFA § 7.3(b).

- No conditions were placed on NWIGU's Issue Fund Grant in Order No. 05-1224. IFA §7.4(c).

At the time that NWIGU submitted its application for an Issue Fund Grant, it was anticipated that NWIGU would jointly employ, along with the Industrial Customers of Northwest Utilities (ICNU), the services of an outside consultant in this proceedings and thus included a request \$5,000 for expert witness fees in addition to the estimated \$14,630 for legal fees and expenses. As the Commission is aware, the focus of AR 499 has been on developing a rule to implement SB 408 that is consistent with the language of the statute. The Commission has held more workshops and has required more written rounds of comments than was initially anticipated at the time that this proceeding commenced and NWIGU submitted its proposed budget. NWIGU has worked closely with other consumer groups, including the Citizens Utilities Board and ICNU. These coordinating efforts have held down the costs to NWIGU of participating in this docket. The length of the proceeding and number of workshops, however, caused NWIGU to incur higher legal fees than anticipated. To offset that reality, NWIGU choose not to also employ the services of the outside expert it anticipated working with at the time that it submitted its proposed budget for this proceeding. Thus, NWIGU requests payment of the higher legal fees, but no reimbursement for an outside technical consultant. NWIGU's law firm has also absorbed some out of pocket expenses and written off some fees to stay within the budget.

Fees included in Exhibit A are directly related to services provided by NWIGU's outside legal counsel. NWIGU requests payment of the \$19,629.00, as the funds were spent on NWIGU's active participation in the case.

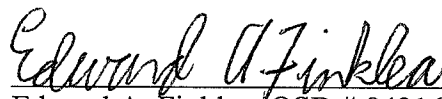
Because the Commission has an obligation to order reimbursement of Eligible Expenses and because NWIGU has satisfied the terms of the IFA, NWIGU respectfully requests that the Commission approve payment of NWIGU's Issue Fund Grant in the amount of \$19,629.00 within 30 days of receipt of this Request for Payment. IFA § 7.6.

Payment should be sent to:

Paula E. Pyron
Executive Director
Northwest Industrial Gas Users
4113 Wolf Berry Court
Lake Oswego, OR 97035-1827

DATED August 18, 2006.

Respectfully submitted,



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Of Attorneys for the
Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused to be served the foregoing **NORTHWEST INDUSTRIAL GAS USERS' REQUEST FOR PAYMENT OF ISSUE FUND GRANT** on the attached Service List obtained on August 18, 2006 from the Oregon Public Utility Commission's Website as follows:

by **MAILING** a full, true and correct copy thereof in a sealed, postage-paid envelope, addressed as shown on the attached Service List, and deposited with the U.S. Postal Service at Portland, Oregon, on the date set forth below;

and by **electronic mail** ("e-mail") to those parties on the Oregon Public Utility Commission's Website Service List who listed an e-mail address.

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DATED: August 18, 2006.



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