BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 69

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In the Matter of

CASCADE NATURAL GAS CORPORATION,

2018 Integrated Resource Plan.

CUB REQUEST FOR AN ISSUE FUND GRANT & PROPOSED BUDGET

The Oregon Citizens' Utility Board ("CUB") estimates eligible expenses of \$6,250 before the 20% match, and requests a grant of \$5,000 from the 2018 Cascade 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 69 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, which is a participating public utility under the IFA. *See* IFA at Article 1(n). The IFA defines an Eligible Proceeding for issue Funds as "iii. an Integrated Resource Plan." IFA, Article 1(c). LC 69 is Cascade's Integrated Resource Plan; thus, an Issue Fund Grant may be made for this proceeding under Article 6.1 of the IFA.

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 March 20, 2018, as required by the IFA (Article 6.2).

Article 6.3 of the IFA requires an intervenor seeking an Issue Fund Grant to file a proposed budget within 30 days after the prehearing conference at which the schedule for the proceeding is established. The prehearing conference in this docket was held on March 7, 2018.

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 participated in the pre-hearing conference. We will attend, either in person or by phone, and participate in all or most workshops, hearings, and any Commission presentations. We will review and analyze Cascade's comments. We will review and analyze comments filed by other parties. We will pursue discovery of Cascade through data requests, and we will respond to data requests asked of us. We will file comments and present our recommendations to the Commission, including any proposed modifications or conditions.
- (b)Description of Areas to Be Investigated: CUB will investigate issues including, but not limited to:
 - i. Whether Cascade's storage proposals are consistent with PUC rules and guidelines;
 - ii. Whether the details, such as the length and size and technology of each project, make sense;
 - iii. Whether the Renewable Resources Automatic Adjustment Clause is an appropriate way to recover costs.
- (c) Description of the Class or Classes Benefiting from CUB's Participation:

CUB represents the interests of Cascade'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 \$5,000 grant from the 2018 Cascade Issue Fund. CUB's budget shows eligible expenses of \$6,250, but CUB limits its request in this case to \$20,000. CUB respectfully requests the

Commission approve CUB's request for a \$5,000 grant from the 2018 Cascade Issue Fund.

- (e) The Budget Showing Estimated Fees and Costs: CUB's budget accompanies this document as Attachment A.
- (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 28th day of March, 2018.

Respectfully submitted,

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Bob Jenks Executive Director Oregon Citizens' Utility Board

CUB Proposed Budget -- LC 69

CUB Internal Expenses	Rate	Hours	Cost
Staff			
Bob Jenks, Executive Director	\$250	7.00	\$1,750.00
Michael Goetz, Staff Attorney	\$225	4.00	\$900.00
Sarah Ryan-Knox, Paralegal	\$100	3.00	\$300.00
Will Gehrke, Economist	\$200	16.00	\$3,200.00
Other Expenses			
Printing, Mailing & Travel			\$100.00

In-House Resources

20% of Eligible Expenses

Total

(\$1,250)

\$5,000