

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 79

In the Matter of

NORTHWEST NATURAL GAS
COMPANY dba NW NATURAL,

2022 INTEGRATED RESOURCES
PLAN.

ALLIANCE OF WESTERN ENERGY
CONSUMERS' NOTICE OF INTENT
TO REQUEST ISSUE FUND GRANT

Pursuant to OAR 860-001-0120 and the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 18-017 (January 17, 2018), Alliance of Western Energy Consumers (“AWEC”) hereby respectfully submits this Notice of Intent to Request an Issue Fund Grant in Docket LC 79. As required by the IFA, AWEC asserts the following:

1. LC 79 is an Eligible Proceeding under the IFA. The IFA defines an Eligible Proceeding as “any Commission proceeding that directly affects one or more of the Participating Public Utilities.” IFA, Section 1(c). LC 79 will directly affect Northwest Natural Gas Company dba NW Natural (“NW Natural”), a Participating Public Utility under Section 1(n) of the IFA. Therefore, an Issue Fund Grant is permissible under Section 6.1 of the IFA.

2. As required by IFA Section 6.2, this Notice of Intent is being served on each affected Participating Public Utility, all pre-certified organizations, and all parties identified on the service list for LC 79.

3. AWEC identifies the NW Natural Issue Fund Account as the account from which AWEC intends to request the Issue Fund Grant.

4. AWEC is the successor to Northwest Industrial Gas Users (“NWIGU”), which is pre-certified under Section 5.2 of the IFA and OAR § 860-001-0120(3) as eligible to receive an Issue Fund Grant. AWEC continues to meet the precertification requirements of Section 5.2 of

the IFA because: it is a non-profit organization, the primary purpose of which is to represent utility customers' interests on an ongoing basis; it represents a broad group of customers directed at public utility rates; it has already demonstrated an ability to effectively represent large energy users and substantively contribute to the record on behalf of those customers; and its members that are customers contribute a significant portion of AWEC's overall funding.

5. AWEC will submit a budget in accordance with Section 6.3 of the IFA. AWEC will also coordinate with the Oregon Citizens' Utility Board ("CUB"), which has also requested an Issue Fund Grant from the same account identified in this notice.

6. 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 when it submits its intervention or for matters that do not involve a formal intervention at such time as the Commission designates. AWEC is filing this notice of intent concurrently with the request for issue fund grant and respectfully requests a waiver of this requirement.

Dated this 29th day of December, 2022.

Respectfully submitted,



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