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ADMITTED IN OREGON AND WASHINGTON

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December 29, 2022

Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol Street, N.E., #215
P.O. Box 2148
Salem, Oregon 97308-2148

Re: In the Matter of NW Natural's 2022 Integrated Resources Plan
(Docket No. LC 79)
Proposed Issue Fund Budget of the Alliance of Western Energy Consumers

Dear Filing Center:

Pursuant to OAR 860-001-0120 and 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 respectfully submits an issue fund budget of \$40,000, which after 20% match by AWEC (\$8,000.00), would result in a maximum net requested issue fund grant of \$32,000.00. To the extent AWEC's actual costs exceed the maximum issue fund grant amount, AWEC will either seek to amend this budget or seek matching funds. AWEC has coordinated this request with the request made by Oregon Citizens' Utility Board (CUB).

Northwest Natural Gas Company, dba NW Natural ("NW Natural") has filed its 2022 Integrated Resources Plan (IRP). The 2022 IRP is a change in the way that NW Natural has historically studied and planned on its system. In the past, the IRP has been focused on distribution investments and gas supply alternatives. The IRP has evaluated system pipeline constraints, through the Synergi model, and analyzed the least cost, least risk alternative for addressing the constraints. Following the enactment of the Climate Protection Plan (CPP) regulations, the IRP has become more complicated. While distribution investments and gas supply alternatives are still a subject of the IRP, environmental compliance, including for transportation customers, has been introduced as a new dimension into the IRP.

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 after October 1,

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2022. AWEC will not include any time, cost or expense that was requested through a matching funds requests.

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 workpapers of NW Natural; (b) drafting discovery and reviewing discovery responses; (c) drafting comments and reviewing comments of other parties; (d) participating in any scheduled calls and/or workshops; (f) preparing for and participating in a hearing in front of the Commission. 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 IRP, including proposed distribution investments and gas supply alternatives. Also, AWEC will review and comment on the PLEXOS production cost model, which evaluates least cost compliance strategies in a Monte Carlo simulation, evaluating the compliance strategies against several different future cases. AWEC will also comment on how NW Natural plans to comply with the CPP, and how the IRP plans and accounts for industrial customers, including the benefit to having interruptible customers on the system.

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 approximately \$111,500.00, but 2023 funds have not been accounted for. To the extent AWEC incurs costs that exceed this request, it will seek to either amend the budget or seek Matching Funds. AWEC has coordinated its request with CUB.

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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. AWEC will not include any time, cost or expense that was requested through a matching funds requests.

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.

7. Article 6.2

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 its notice of intent concurrently with the request for issue fund grant and respectfully requests a waiver of this requirement.

8. Article 6.3

Article 6.3 of the IFA requires an intervenor seeking an Issue Fund Grant to file its proposed budget "30 days after the prehearing conference at which the schedule for the proceeding is established or by such other date as the Commission designates." AWEC respectfully requests a waiver of this requirement of the IFA.

CONCLUSION

AWEC respectfully requests that the Commission approve its Issue Fund Budget in the amount of \$40,000.00. AWEC further requests approval of an Issue Fund Grant in an amount of \$32,000 from 2023 funds in the NW Natural Issue Fund account.

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

Very truly yours,



Chad M. Stokes

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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, review revision; attend calls on IRP; preparation of and review of discovery, work with consultant to develop comments and review comments of other parties; work with consultant to develop response comments	Partner	50	\$325	\$16,250
Attend any workshop and prepare for and attend Commission meeting	Partner	11.6	\$325	\$3575
Total AWEC Budget for Legal Services (Cable Huston)				\$20,000
Less 20% Match Using In-house Resources				\$4,000
Total Issue Fund Grant Request				\$16,000

Estimated Expert Witness Budget for Issue Fund Grant

AWEC has already retained Brad Mullins to assist with AWEC's analysis in this matter.

<u>Personnel</u>	<u>Title</u>	<u>Rate</u>
Bradley Mullins	Consultant	\$236/hour

Review filing, exhibits, workpapers, assistance with the preparation of data requests; review IRP model, analysis of responses to discovery requests and assistance with preparation of additional

discovery, preparation of comments; review and analysis of comments from other parties, assist with preparation of reply comments.

Estimated Expert Witness Fees (Budget)	\$20,000
20 Percent In-House Resources	\$4,000
Total AWEC Request for Expert Witness Fees (Grant)	\$16,000
Total AWEC Budget for Legal Services (Cable Huston)	\$20,000
20 Percent In-House Resources	\$4,000
Total AWEC Request for Legal Services(Grant)	\$16,000
Total Budget (Legal + Expert)	\$40,000
Less 20% Match Using In-house Resources	\$8,000
Total Issue Fund Grant Request (Budget – 20% in-house)	\$32,000