

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 79

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|---------------------------|---|-----------------------------|
| In the Matter of |) | |
| |) | |
| NORTHWEST NATURAL GAS |) | REQUEST FOR PAYMENT OF NW |
| COMPANY dba NW NATURAL |) | NATURAL ISSUE FUND GRANT OF |
| |) | ALLIANCE OF WESTERN ENERGY |
| 2022 INTEGRATED RESOURCES |) | CONSUMERS |
| PLAN |) | |
| |) | |
| |) | |
| |) | |

Pursuant to Section 7.3 of 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 requests payment of AWEC’s Issue Fund Grant in Docket No. LC 79 in the amount of \$32,000.00. In support of this request, AWEC states the following:

1. On September 23, 2022, Northwest Natural Gas Company (“NW Natural”) filed its Integrated Resource Plan (“IRP”), the first IRP to reflect how NW Natural plans to comply with the Climate Protection Plan. On November 9, 2022, AWEC intervened in LC 79, although AWEC’s involvement in NW Natural’s IRP predated its intervention.
2. On December 29, 2022, AWEC filed a Proposed Issue Fund Budget in this docket in the amount of \$40,000, less in-house resources of 20 percent, for a total Issue Fund Grant request of \$32,000.00. The Commission approved the Issue Fund Grant in the amount of \$32,000.00 on February 8, 2023, finding that “In light of the issues being addressed, the complexity of the issues and the significant policy decisions to be made,

the Commission believes that AWEC's proposed budget is reasonable and should be approved.”¹

3. AWEC participated in all stages of NW Natural’s IRP, including attending pre-filing and post filing conferences and presentations, reviewing NW Natural’s IRP and modeling; providing several rounds of comments, reviewing comments of other parties, attending the public meeting and the public meeting for the Commission’s deliberation and participating in meetings to address energy efficiency programs for transportation customers. AWEC hereby requests that the Commission authorize the approved Issue Fund Grant in this docket in the amount of \$32,000.00. AWEC’s Eligible Expenses for this proceeding through from October 1, 2022 through July 31, 2023 are shown in **Confidential Exhibit A.**

4. AWEC respectfully submits that this request for payment satisfies the requirement of IFA Section 7.3 as follows:

Section 7.3(a) - The itemized expenses, payees and hourly rates are attached as **Confidential Attachment A.**

Section 7.3(b) - AWEC was a full and active participant in this docket. AWEC focused on all aspects of NW Natural’s IRP, including proposed distribution investments and gas supply alternatives. AWEC also reviewed and commented 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 also commented on how NW

¹ Docket LC 79, Order 23-037 (Feb 8, 2023).

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. AWEC also made several recommendations for future IRPs, including the merits of an energy efficiency program for transportation customers. The expenses included in **Confidential Attachment A** are Eligible Expenses as defined in IFA Section 7.4 and are reasonable and directly attributable to AWEC's participation in LC 79 on behalf of industrial customers.

Section 7.3(c) – The only condition of the Issue Fund Grant is that AWEC must contribute 20% of Eligible Expenses using in-house resources. AWEC used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA.

Section 7.3 (d) – This request is a request for final payment of the approved Issue Fund Grant in this docket. AWEC's expenses and costs exceeded its estimated budget in this docket. AWEC will seek the remainder of its fees and expenses through Matching Funds.

5. Section 7.4 – All of the expenses included in **Confidential Attachment A** are Eligible Expenses as defined in Section 7.4 of the IFA and are consistent with AWEC's proposed budget in this proceeding.

6. Upon approval of this request for payment by the Commission, NW Natural should send payment to AWEC as follows:

Alliance of Western Energy Consumers
3519 NE 15th Avenue #249
PORTLAND, OR 97212

Or via wire transfer

To: Alliance of Western Energy Consumers
Wells Fargo Bank
Newberg, OR 97132
ABA: [REDACTED]
Acct: [REDACTED]

7. AWEC has satisfied the terms of the IFA and respectfully requests that the Commission approve payment of AWEC's Issue Fund Grant in the amount of \$32,000.00 from the NW Natural Issue Fund within 30 days of receiving this Request for Payment as provided in Section 7.6 of the IFA.

8. AWEC's expenses and costs exceeded its estimated budget in this docket. With this payment, there will be no funds remaining in the approved Issue Fund Grant, and AWEC will seek the remainder of its fees and expenses through Matching Funds.

Dated this 7th day of August, 2023.

CABLE HUSTON LLP



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