

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 462

In the Matter of

NW Natural’s Renewable Natural Gas
Adjustment Mechanism- Dakota City

OREGON CITIZENS’ UTILITY
BOARD’S AND ALLIANCE OF
WESTERN ENERGY CONSUMER’S
JOINT MOTION TO DESIGNATE
DOCKET AS ELIGIBLE
PROCEEDING FOR ISSUE FUNDS

Pursuant to Section 1(c)(v) of the Fifth Amended Intervenor Funding Agreement (“IFA”), approved on December 29, 2022 by the Public Utility Commission of Oregon (“Commission”) in Order No. 22-506, the Oregon Citizens’ Utility Board (“CUB”) and Alliance of Western Energy Consumers (“AWEC”) file this joint motion to designate the above-referenced docket as eligible for an Issue Fund Grant.

This docket directly affects Northwest Natural Gas Company (“NW Natural”), a Participating Public Utility under Section 1(k) of the IFA and which initiated this docket.

Section 1(c)(v) of the IFA defines “Eligible Proceeding for Issue Funds” as, among other things, a proceeding “so designated by the Commission that directly affects one or more of the Participating Utilities and is anticipated to have a substantial impact on utility rates or service, a significant impact on utility customers or the operations of the utility, is likely to result in a significant change in regulatory policy, or raises novel questions of fact or law.”

This proceeding involves NW Natural’s Dakota renewable natural gas project in Dakota City, Nebraska, which will be used by NW Natural for Climate Protection Plan (“CPP”) compliance. This proceeding will involve an analysis of whether the renewable natural gas project is prudent, whether the risks of the project have been fairly allocated between NW Natural, developers and ratepayers, and if there are most cost effective ways to comply with the

CPP. As only the second large out of state renewable natural gas project by NW Natural, this proceeding has the potential to raise both novel issues of fact and law for Oregon gas utilities and their customers. Because of the size of this renewable natural gas project this docket will have a significant impact on utility rates and service. Further, as this is the first renewable natural gas project that will be litigated under NW Natural’s renewable natural gas automatic adjustment clause, its regulatory treatment represents a novel arena that will include new legal and policy issues.

Therefore, for the foregoing reasons, CUB and AWEC respectfully move the Commission to designate this proceeding as an “Eligible Proceeding for Issue Funds” under the IFA.

Dated this 11th day of April 2023.

Respectfully submitted,



Chad M. Stokes, OSB No. 004007
Cable Huston LLP
1455 SW Broadway, Suite 1500
Portland, OR 97201-3412
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-Mail: cstokes@cablehuston.com

Of Attorneys for
Alliance of Western Energy Consumers

/s/ Michael P. Goetz
Michael P. Goetz, OSB No. 141465
General Counsel
Oregon Citizens’ Utility Board
610 SW Broadway, Suite 400
Portland, OR 97205
mike@oregoncub.org