BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1635

In the Matter of))
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL)))
Mechanism for Recovery of Environmental Remediation Costs))))

CUB REQUEST FOR AN ISSUE FUND GRANT & PROPOSED BUDGET

The Citizens' Utility Board of Oregon ("CUB") requests a grant of \$25,000 from the NW Natural Issue Fund. This presumes a fully litigated case; settlement of some or all of the issues would likely reduce our total request for reimbursement. CUB staff will keep track of their participation by hours and activity.

CUB is precertified per OAR 860-001-0120(3)(a). UM 1635 is an eligible proceeding under the Second Amended and Restated Intervenor Funding Agreement ("IFA") as approved by the Oregon Public Utility Commission in Order No. 12-452, entered November 20, 2012. The proceeding directly affects NW Natural, which is a participating public utility under the IFA. *See* Order No. 12-452 at Article 1(k). CUB filed its Notice of Intent to Request an Issue Fund Grant concurrent with its Notice of Intervention, as required by the IFA (Article 6.2).

Pursuant to Article 6.3 of the IFA, the proposed budget must identify certain points of information. We provide 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, and will participate in subsequent pre-hearing conferences. We have and will continue to attend, either in person or by phone, and participate in all or most workshops, settlement meetings, hearings, and any Commission presentations. We will review and analyze NW Natural's direct, reply, and surrebuttal testimony, and briefs. We will review and analyze testimony and briefs filed by other parties. We will pursue discovery of NW Natural through data requests, and will respond to data requests asked of us. We will file opening and rebuttal testimony and file opening and closing briefs and present our recommendations to the Commission, including any proposed modifications or conditions.

- (b) Description of Areas to Be Investigated: CUB intends to investigate issues including, but not limited to:
 - A. The prudence of NW Natural's environmental remediation costs;
 - B. The appropriate deadband to be applied to recovery of environmental remediation costs;
 - C. The appropriate application of the earnings test ordered in docket UG 221;
 - D. The appropriate rate spread to apply to recoverable costs; and
 - E. Issues raised by other parties to this proceeding.
- (c) Description of the Class or Classes Benefiting From CUB's Participation:
 CUB represents the interests of NW Natural'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 an issue fund grant of \$25,000 from the NW Natural Issue Fund. Though

CUB's budget reflects expenses in excess of \$25,000, CUB's request in this docket is reduced in order to accommodate other NW Natural dockets. As of February 22, 2013, the NW Natural Issue Fund had an uncommitted balance of approximately \$67,056.41.

- *(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 20th day of March, 2013 Respectfully submitted,

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Executive Director Citizens' Utility Board of Oregon

Attachment A

CUB Budget - UM 1635

CUB Internal Expenses	Rate	Hours	Cost
Staff			
Bob Jenks, Executive Director	\$250	50	\$12,500
Catriona McCracken, General Counsel	\$250	65	\$16,250
SA Anders, Business and Projects Mgr	\$75	2	\$150
Erin Scheurer, Law Clerk	\$75	20	\$1,500
Nadine Hanhan, Utility Analyst	\$125	40	\$5,000
Sommer Templet, Staff Attorney	\$175	35	\$6,125
Other Expenses			
Printing & Mailing			\$100
Travel			\$150
In-House Resources			
20% of Eligible Expenses			(\$8,355)
5			
Total			
			\$33,420
CUB Request			\$25,000.00
			+

UM 1635 – CERTIFICATE OF SERVICE

I hereby certify that, on this 20th day of March, 2013, I served the foregoing **CUB REQUEST FOR AN ISSUE FUND GRANT & PROPOSED BUDGET** in docket UM 1635 upon each party listed in the UM 1635 PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

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W NORTHWEST INDUSTRIAL GAS

C USERS

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(C denotes service of Confidential material authorized)

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UM 1635 - Certificate of Service CUB REQUEST FOR AN ISSUE FUND GRANT & PROPOSED BUDGET

W PUC STAFF

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Respectfully submitted,

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