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December 18, 2012

VIA ELECTRONIC FILING & U.S. MAIL

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

Re: In the Matter of Northwest Natural Gas Company dba NW Natural Mechanism for Recovery of Environmental Remediation Costs **Docket No. UM 1635**

Dear Filing Center:

Enclosed please find the original and one (1) copy of the NORTHWEST INDUSTRIAL GAS USERS' NOTICE OF INTENT TO REQUEST AN ISSUE FUND GRANT in the above-referenced docket.

Thank you for your assistance with this filing. Should you have any questions, please feel free to contact me.

Very truly yours,

Tommy A. Brooks

TAB:sk Enclosures

cc: UM 1635 Service List

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

NORTHWEST INDUSTRIAL GAS USERS' NOTICE OF INTENT TO REQUEST ISSUE FUND GRANT

Pursuant to OAR § 860-001-0120 and the First Amended and Restated Intervenor Funding Agreement dated December 5, 2007 ("IFA"), approved by the Oregon Public Utility Commission ("Commission") in Order No. 07-564 on December 19, 2007, the Northwest Industrial Gas Users ("NWIGU") hereby respectfully submit this Notice of Intent to Request an Issue Fund Grant in Docket No. UM 1635. As required by the IFA, NWIGU asserts the following:

1. UM 1635 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). UM 1635 will directly affect Northwest Natural Gas Company ("NW Natural"), which is a Participating Public Utility under Section 1(k) 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 UM 1635.

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

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4. NWIGU has been precertified under Section 5.2 of the IFA and OAR § 860-001-0120(3) as eligible to receive an Issue Fund Grant.

5. NWIGU will submit a budget in accordance with Section 6.3 of the IFA.

NWIGU notes that, by the time the proposed budget is due to be filed with the Commission for the proposed Issue Fund Grant, the IFA will have terminated and the Second Amended and Restated Intervenor Funding Agreement ("New IFA") will then be in effect, superseding the IFA. The material terms of the New IFA relating to the timing of this notice and a proposed budget remain the same as currently exist in the IFA. NWIGU requests that the Commission acknowledge this notice as satisfying the terms of both the IFA and the New IFA.

Dated this 18th day of December 2012.

Respectfully submitted,

Chad M. Stokes, OSB No. 004007 Tommy A. Brooks, OSB No. 076071 Cable Huston 1001 SW Fifth Ave., Suite 2000 Portland, OR 97204-1136 Telephone: (503) 224-3092 Facsimile: (503) 224-3176 E-Mail: <u>cstokes@cablehuston.com</u> tbrooks@cablehuston.com

Of Attorneys for the Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

I CERTIFY that I have on this day served the foregoing document upon all parties of

record in this proceeding via electronic mail and/or by mailing a copy properly addressed with

first class postage prepaid.

Citizens Utility Board (W)

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Citizens Utility Board (W)

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Public Utility Commission

Judy Johnson PO Box 2148 Salem, OR 97308-2148 judy.johnson@state.or.us

Industrial Customers of Northwest Utilities c/o Davison VanCleve 333 SW Taylor - STE 400 Portland OR 97204 mail@dvclaw.com

Dated in Portland, Oregon, this 18th day of December 2012.

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