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January 23, 2015

**VIA ELECTRONIC FILING  
& FIRST CLASS 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*  
*Mechanism for Recovery of Environmental Remediation Costs*  
Docket No. UM 1635**

Dear Filing Center:

Enclosed for filing in the above-referenced matter, please find an original and one (1) copy of the **Request for Payment of Phase II Issue Fund Grant of Northwest Industrial Gas Users**. Please note Exhibit A to the Request is Confidential and should not be posted to the Commission website. The confidential Exhibit will only be provided via first class mail to the Commission and to NW Natural.

A copy of the attached, without the confidential exhibit, will be served on the current Service List via e-mail and/or first class mail.

Thank you for your assistance, and please do not hesitate to contact our office with any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read "T. Brooks", is written over a light blue horizontal line.

Tommy A. Brooks

cc: UM 1635 Service List (via e-mail and/or first class mail)

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1635**

In the Matter of )  
 )  
NORTHWEST NATURAL GAS ) REQUEST FOR PAYMENT OF  
COMPANY, dba NW NATURAL ) PHASE II ISSUE FUND GRANT OF  
 ) NORTHWEST INDUSTRIAL GAS  
 ) USERS  
Mechanism for Recovery of )  
Environmental Remediation Costs. )

Pursuant to Section 7.3 of the Second Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) in Order No. 12-432 (November 20, 2012), Northwest Industrial Gas Users (“NWIGU”) hereby requests payment of NWIGU’s Issue Fund Grant in Docket No. UM 1635 in the amount of \$29,545.73. In support of this request, NWIGU shows the following:

1. On December 18, 2012, NWIGU filed its initial Notice of Intent to Request an Issue Fund Grant in this docket. The Commission approved a grant and on September 30, 2013, NWIGU requested payment of an Issue Fund Grant for Phase I of this proceeding. The Commission approved that request on October 14, 2013 by Order No. 13-369.

2. Following the end of Phase I of this docket, on April 14, 2014, NWIGU submitted a Phase II proposed budget in the amount of \$37,500 less in-house resources of 20 percent, for \$30,000. The Commission approved the Issue Fund Grant for NWIGU in the amount of \$30,000 on April 17, 2014 through Order No. 14-137.

2. NWIGU hereby requests that the Commission authorize payment of the Issue Fund Grant in this docket in the amount of \$29,545.73. NWIGU's Eligible Expenses for this proceeding through December 31, 2014 are shown in Confidential Attachment A.

3. NWIGU respectfully submits that this request for payment satisfies the requirement of IFA Section 7.4 as follows:

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

Section 7.3(b) - NWIGU is a full and active participant in this docket. During Phase II of this proceeding, NWIGU and its consultants participated in discovery, participated in workshops, participated in informal meetings and telephone conferences with NW Natural, its consultants, Staff and CUB, participated in settlement workshops and discussions, and filed briefs. The expenses included in Confidential Attachment A are Eligible Expenses as defined in IFA Section 7.4 and are reasonable and directly attributable to NWIGU's participation in UM 1635 on behalf of all customers.

Section 7.4(c) - NWIGU used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA. In addition NWIGU has supplied substantial resources in this proceeding through its Executive Director's active involvement in addition to the Eligible Expenses set forth on Attachment A, which Attachment reflects only those Eligible Expenses from outside legal counsel at the law firm of Cable Huston LLP and NWIGU's expert witness, Mike Gorman from Brubaker & Associates, Inc. ("BAI").

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 NWIGU's proposed budget in this proceeding. No conditions were placed on NWIGU's Issue Fund Grant in Order No. 14-137.

4. Upon approval of this request for payment by the Commission, NW Natural should send payment to NWIGU as follows (which address is different than NWIGU's mailing address for service):

Edward Finklea  
Executive Director  
Northwest Industrial Gas Users  
P.O. Box 2058  
Tualatin, Oregon 97062

5. NWIGU's expenses were only slightly lower than anticipated in this proceeding, resulting in \$454.27 remaining in the Issue Fund Grant after this request for payment and that amount should be released back to the NW Natural Issue Fund Grant account.

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NWIGU has satisfied the terms of the IFA and respectfully requests that the Commission approve payment of NWIGU's Issue Fund Grant in the amount of \$29,545.73 within 30 days of receiving this Request for Payment as provided in Section 7.6 of the IFA.

Dated this 22<sup>nd</sup> day of January 2015.

CABLE HUSTON LLP



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Of Attorneys for  
Northwest Industrial Gas Users

**CERTIFICATE OF SERVICE**

I hereby certify that I caused to be served the foregoing **REQUEST FOR PAYMENT OF PHASE II ISSUE FUND GRANT OF THE NORTHWEST INDUSTRIAL GAS USERS** via electronic mail and, where paper service is not waived, via postage-paid first class mail upon the following parties of record:

**Citizens Utility Board (W)**

Robert Jenks  
G. Catriona McCracken  
610 SW Broadway, Suite 400  
Portland, OR 97205  
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[dockets@oregoncub.org](mailto:dockets@oregoncub.org);  
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**Portland General Electric**

Richard George  
Jay Tinker  
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**PUC Staff – Department of Justice**

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1162 Court Street, NE  
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**Northwest Natural**

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Portland, OR 97209  
[mark.thompson@nwnatural.com](mailto:mark.thompson@nwnatural.com);  
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**Northwest Industrial Gas Users**

Edward Finklea  
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Lake Oswego, OR 97034  
[efinklea@nwigu.org](mailto:efinklea@nwigu.org)

**McDowell Rackner & Gibson**

Lisa F. Rackner  
419 SW 11<sup>th</sup> Avenue, Suite 400  
Portland, OR 97205  
[dockets@mcd-law.com](mailto:dockets@mcd-law.com)

**Public Utility Commission**

Judy Johnson  
PO Box 1088  
Salem, OR 97308-1088  
[judy.johnson@state.or.us](mailto:judy.johnson@state.or.us)

Dated in Portland, Oregon, this 22<sup>nd</sup> day of January 2015.



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Of Attorneys for  
Northwest Industrial Gas Users