## **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

Pursuant to Section 6.3 of the Second Amended and Restated Intervenor Funding Agreement ("IFA"),<sup>1</sup> the Citizens' Utility Board of Oregon ("CUB") requests a grant of \$15,000 from the 2014 NW Natural Issue Fund. CUB staff will keep track of their participation by hours and activity.

CUB is precertified per OAR 860-001-0120(3)(a) and Article 5.2(a) of the IFA. UM 1635 is an eligible proceeding under Article 1(c) of the IFA. UM 1635 directly affects NW Natural, which is a participating public utility under Article (k) of the IFA.

On December 12, 2012, 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). On March 20, 2013, CUB filed its proposed budget, which was approved by the Commission on March 27, 2013 in Order No. 13-103. The parties, including CUB, fully participated in the UM 1635 proceedings, which led to the filing of two stipulations that the parties

<sup>&</sup>lt;sup>1</sup> The Second Amended and Restated Intervenor Funding Agreement was approved by the Commission in Order No. 12-452 (Nov. 20, 2012) and was subsequently supplemented by Exhibits A, B and C by Order No. 13-317 (Sept. 3, 2013).

believed would resolve all of the issues in the case. Because its proposed budget had been met, CUB filed for final payment in this docket on July 19, 2013. The Commission approved CUB's request on July 25, 2013 in Order No. 13-275. In Order 13-424, entered November 18, 2013, the Commission rejected the stipulations filed by the parties and ordered further proceedings, thereby initiating a second phase of the UM 1635 docket.

Article 6.3 of the IFA, states, in relevant part:

In proceedings with multiple phases, proposed budgets should encompass work to be performed in the initial phase of the proceeding. In the even the proceeding continues beyond the initial phase, the Commission will establish a schedule for intervenors to submit proposed budgets for any later phase(s) of the proceeding.

CUB requests an issue fund grant in docket UM 1635 for the second phase of this proceeding. Section 6.3 also requires that the proposed budget 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 the second phase of this case. CUB participated setting a schedule for phase
2. We will attend, either in person or by phone, and participate in all or most workshops, settlement meetings, hearings, and any Commission presentations that may be scheduled in phase 2 of this proceeding. We will review and analyze NW Natural's direct and rebuttal 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 response and rebuttal testimony, as well as a pre-hearing brief and closing brief. We will 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 appropriate deadband to be applied to recovery of environmental remediation costs;
  - B. The appropriate application of the earnings test ordered in docket UG 221;
  - C. The appropriate rate spread to apply to recoverable costs; and
  - D. 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 \$15,000 from the 2014 NW Natural Issue Fund. As of January 17, 2014, the 2014 NW Natural Issue Fund had an uncommitted balance of approximately \$68,872.41.
- *(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.

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Dated this 19<sup>th</sup> day of February, 2014 Respectfully submitted,

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Executive Director Citizens' Utility Board of Oregon

# CUB Proposed Budget Phase II - UM 1635

CUB Internal Expenses	Rate	Hours	Cost
Staff			
Bob Jenks, Executive Director	\$250	25.0	\$6,250
Catriona McCracken, General Counsel	\$250	25.0	\$6,250
Jaime McGovern, Sr. Utility Analyst	\$225	15.0	\$3,375
SA Anders, Business and Projects Mgr	\$75	1.0	\$75
Law Clerk	\$75	2.0	\$150
Nadine Hanhan, Utility Analyst	\$125	7.0	\$875
Sommer Templet, Staff Attorney	\$175	10.0	\$1,750
<i>Other Expenses</i> Printing, Mailing & Travel			\$25
In-House Resources			
20% of Eligible Expenses			(\$3,750)
Total			
			\$15,000
Budget Request			\$15,000.00

# **UM 1635 – CERTIFICATE OF SERVICE**

I hereby certify that, on this 19<sup>th</sup> day of February, 2014, 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) (HC denotes highly confidential)

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#### C GIBSON PC

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

Respectfully submitted,

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