

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2178**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Natural Gas Fact Finding per Executive  
Order 20-04 PUC Year One Work Plan.

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 Fourth Amended Intervenor Funding Agreement (“IFA”), approved on January 17, 2018 by the Public Utility Commission of Oregon (“Commission”) in Order No. 18-017, the Oregon Citizens’ Utility Board (“CUB”) and Alliance of Western Energy Consumers (“AWEC”) file this motion to designate the above-referenced docket as eligible for an Issue Fund Grant.

This docket directly affects Avista Corporation (“Avista”), Cascade Natural Gas Corporation (“Cascade”) and Northwest Natural Gas Company (“NW Natural”), each of which are Participating Public Utilities under Section 1(k) of the Restated IFA and which are participating in 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, among other things, how Oregon natural gas utilities will comply with Executive Order 20-04, including the costs, benefits and impact to customers.

More specifically, this proceeding will involve an analysis of the potential natural gas utility bill impacts that may result from limiting greenhouse gas (“GHG”) emissions of regulated natural gas utilities while ensuring that customers continue to have safe, affordable and reliability utility services. Executive Order 20-04 also reflects a significant change in regulatory policy, and will likely raise both novel issues of fact and law for Oregon gas utilities and their customers. Further, compliance with Executive Order 20-04 may have a significant impact on utility rates and service, as utilities may be required to make significant changes to their business operations, including development of renewable natural gas and renewable hydrogen resources.

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 8<sup>th</sup> day of July, 2021.

Respectfully submitted,

s/ Chad M. Stokes

Chad M. Stokes, OSB No. 004007

Cable Huston LLP

1455 SW Broadway, Suite 1500

Portland, OR 97201-3412

Telephone: (503) 224-3092

E-Mail: cstokes@cablehuston.com

Attorneys for

Alliance of Western Energy Consumers

s/ Michael P. Goetz

Michael P. Goetz, OSB #141465

General Counsel

Oregon Citizens' Utility Board

610 SW Broadway, Ste. 400

Portland, OR 97205

Telephone: (503) 227-1984

E-Mail: mike@oregoncub.org