

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKET NOS. UG 210755
)	
Complainant,)	PROPOSED BUDGET OF
)	THE ALLIANCE OF WESTERN ENERGY
)	CONSUMERS
v.)	
)	
CASCADE NATURAL GAS CORPORATION)	
)	
Respondent.)	
_____)	

INTRODUCTION

1. Pursuant to the Washington Interim Participatory Funding Agreement (“IFA”), approved by the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) in Order 01 in Docket No. U-210595, and Order 06 Granting Requests for Case Certification in the above referenced docket, Alliance of Western Energy Consumers (“AWEC”) hereby respectfully submits its Proposed Budget for a Fund Grant in this proceeding.
2. On September 30, 2021, Cascade Natural Gas Corporation (“Cascade”) filed its request for a general rate revision for natural gas distribution service. In its filing, Cascade requested to increase its annual revenue requirement by approximately \$13.7 million, a 13 percent margin increase. The Commission docketed Cascade’s filing as UG 210755.
3. Docket UG 210755 is an Eligible Proceedings for Fund Grants under Article 1(c) of the IFA. Accordingly, a Fund Grant may be made for this proceeding under the IFA.
4. On March 14, 2022, as required by Article 6.2 of the IFA, AWEC filed its Request for Case Certification and Notice of Intent to request a Fund Grant, which was also served on

Cascade and all parties of record in the proceeding. In that filing, AWEC identified the Cascade Customer Representation Sub-Fund as the account from which AWEC intends to request a Fund Grant.

5. On March 25, 2022, the Commission granted AWEC's Request for Case Certification, finding that:

AWEC. AWEC is also a non-profit organization that represents broad customer interests. RCW 80.28.430(1) provides that organizations representing "broad customer interests" includes organizations representing "industrial" customers. In its Policy Statement, the Commission recognized certain "incumbent" organizations that a history of representing these customer interests before the Commission and specifically referred to AWEC.

AWEC demonstrates that it can effectively represent the particular customers it seeks to represent. AWEC routinely appears before the Commission, participates in settlements, and offers testimony at evidentiary hearings without causing undue delays. Although AWEC recently opposed a settlement in a power-cost only rate case, the Commission was still provided sufficient opportunity to reinstate a procedural schedule, and AWEC did not seek to delay the proceeding beyond what was necessary to present its opposition.¹¹ We agree that the public interest is served by AWEC's participation and that no other party adequately represents the interests of industrial customers. We therefore grant AWEC's Request for Case Certification.¹

6. Article 6.3 of the IFA provides that Case-certified Participating Organizations seeking a Fund Grant must submit a proposed budget to the Commission. Accordingly, AWEC has attached a budget as **Appendix A** on the Commission's standardized form. AWEC's proposed budget is based on AWEC's full participation in this proceeding up to and including an evidentiary hearing and briefing, including time and expenses that have already been incurred to date.

¹ Dockets UG 210755, Order 06 at ¶ 19-20 (Mar. 25, 2022)(internal footnotes omitted).

The IFA also requires the following information:

1. A Statement of the Work to be Performed.

7. AWEC has retained Cable Huston, LLP to represent it in this proceeding. AWEC has participated and will continue to participate in all stages of this general rate case proceeding. This participation includes: (a) a review of the initial filing, workpapers and testimony of Cascade; (b) drafting discovery and reviewing discovery responses; (c) preparing for and attending multiple settlement conferences and reviewing the settlement entered into by Commission Staff and Cascade; (d) drafting testimony and reviewing the testimony of other parties; and (e) participating in prehearing/status conferences; (f) preparing for and attending the evidentiary hearing; (g) drafting briefs and reviewing briefs of other parties. AWEC has retained an expert witness to assist legal counsel in this proceeding.

2. A Description of the Areas to be Investigated.

8. General rate proceedings are, by their nature, complex and involve all aspects of utility operations and service to customers. AWEC has and will focus on all aspects of Cascade's requested increase to natural gas distribution rates, including whether the settlement entered into by Cascade and Staff will result in rates that are fair, just and reasonable. AWEC's investigation will include an analysis of the requested revenue requirement, capital structure, cost of debt, jurisdictional allocations, rate base, special contract revenues, working capital, billing determinants, MDU cross charges, memberships and dues, director stock awards, cost recovery mechanism, proposed capital additions, tax issues and depreciation.

3. Identification of the specific Sub-Fund from which the applicant is seeking a Fund Grant and an estimate of the amount of available funds in that account, if known.

9. AWEC identifies the Cascade Customer Representative Sub-Fund as the account from which AWEC is seeking monies. As of the date of this submittal, the uncommitted balance of that fund is \$177,008. AWEC is coordinating its request for Fund Grant with The Energy Project as required under Article 6.6 of the IFA.

4. A Budget Showing Estimated Attorneys' fees.

10. AWEC has attached a budget for attorneys' fees for AWEC's participation in this proceeding as **Exhibit A**.

5. A budget Showing Estimated consultant and expert witness fees.

11. AWEC has attached a budget for consultant and expert witness fees for AWEC's participation in this proceeding as **Exhibit A**.

6. AWEC members in Cascade's service territory.

12. Attached as **Confidential Exhibit B**, AWEC has included a list of its members in Cascade's service territory.

CONCLUSION

13. AWEC and its predecessor organization have been involved in Cascade rate proceedings for more than 20 years. AWEC routinely sponsors expert witnesses that identify numerous adjustments to Cascade's proposed revenue requirement. AWEC's advocacy has directly resulted in lower energy costs for industrial customers and all other customer classes. AWEC respectfully requests that the Commission approve its Fund Grant in the amount of \$45,000.00.

Dated in Portland, Oregon, this 21st day of April, 2022.

Respectfully submitted,



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EXHIBIT A

UG-210755

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
Senior attorney	120	\$310	\$37,200
Expert Witness	110	\$237	\$26,070
Other Expenses			

Total: **\$63,270**

AWEC Request for Cascade Customer Representation
Sub Fund Grant **\$45,000**

EXHIBIT B

UG-210755

(Confidential)

AWEC members in Cascade's service territory

