

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKET NO. UG 210755
)	
Complainant,)	REQUEST FOR PAYMENT OF FUND
)	GRANT OF ALLIANCE OF WESTERN
v.)	ENERGY CONSUMERS
)	
CASCADE NATURAL GAS CORPORATION)	REDACTED
)	
Respondent.)	
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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 and Order 08 Approving Proposed Budgets in Docket No. UG 210755, Alliance of Western Energy Consumers (“AWEC”) hereby respectfully requests payment of a Fund Grant from the Cascade Natural Gas Corporation (“Cascade”) Customer Representation Sub-Fund in the amount of \$45,000. In support of this request, AWEC states the following:

2. On September 30, 2021, Cascade filed its request for a general rate revision for natural gas distribution service in Washington. In its filing, Cascade requested to increase its annual revenue requirement by approximately \$13.7 million. On October 5, 2021, AWEC timely intervened and began its review of the case.

3. The Commission approved the IFA with an Effective Date of January 1, 2022. Section 7.3 of the IFA provides that “Eligible expenses may include costs incurred in relation to a proceeding for which a Participating Organization has an approved budget, but which were incurred prior to the Effective Date of this Interim Agreement.”
4. On March 14, 2022 AWEC filed a Request for Case Certification and Notice of Intent to Request a Fund Grant in Docket UG 210755. On March 25, 2022, the Commission issued Order 06 Granting Requests for Case Certification filed on behalf of AWEC and The Energy Project.¹
5. On April 21, 2022, AWEC filed a Proposed Budget and requested a Fund Grant in this docket in the amount of \$45,000 to partially offset the costs of its participation in the proceeding. The Commission approved AWEC’s Proposed Budget for a Fund Grant in the amount of \$45,000 on June 13, 2022.² As shown on **Confidential Attachment A**, AWEC’s Proposed Budget for a Fund Grant only partially offsets AWEC’s costs of participating in this proceeding.
6. AWEC focused on all aspects of Cascade’s requested increase to natural gas distribution rates, including whether the settlement entered into by Cascade and Staff resulted in rates that are fair, just and reasonable. AWEC’s investigation included an analysis of the requested revenue requirement increase, 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, Cascade’s cost recovery mechanism, proposed capital additions, tax issues, including Cascade’s proposal to address IRS Private Letter Ruling 101961-21 and depreciation.

¹ *In the Matter of Washington Utilities and Transportation Commission v. Cascade Natural Gas Corporation*, WUTC Docket No. UG 210755, Order No. 06 (March 25, 2022).

² *Id.* Order No. 08 (June 13, 2022).

7. AWEC respectfully submits that this request for payment satisfies the requirement of IFA Section 7.1 as follows:

Section 7.1(a) - The itemized expenses, payees and hourly rates for amounts to be reimbursed, including billing details, and including separately identified amounts for consultant or expert fees and travel expenses are attached as **Confidential Attachment A**.

Section 7.3(b) - AWEC was a full and active participant in this docket and the expenses are reasonable and are directly attributable to issues and positions pursued on behalf of customers and consistent with AWEC's Proposed Budget. AWEC issued and reviewed discovery, participated in a settlement conference, participated in several prehearing/status conferences, filed a response to the Commission's Notice of Intent to Consolidate Docket UG 210755 and UG 220198, filed testimony opposing the settlement between Commission Staff and Cascade, reviewed testimony of other parties; filed a response to Cascade's motion to strike portions of AWEC's testimony, prepared for and attended an evidentiary hearing and filed a closing brief. The expenses included in **Confidential Attachment A** are Eligible Expenses as defined in IFA Section 7.3 and are reasonable and directly attributable to AWEC's participation in UG 210755 on behalf of all customers.

Section 7.1(c) – There were no conditions under this Fund Grant.

Section 7.1(d) – This request is a final request for payment under this Approved Fund Grant for the full amount of the Approved Fund Grant.

Section 7.3 – All of the expenses included in **Confidential Attachment A** are Eligible Expenses as defined in Section 7.3 of the IFA and are consistent with AWEC’s Proposed budget in this proceeding.

8. Upon approval of this request for payment by the Commission, please send payment to AWEC as follows:

Alliance of Western Energy Consumers
818 SW Third Avenue #266
Portland, OR 97204

9. AWEC has satisfied the terms of the IFA and respectfully requests that the Commission approve payment of AWEC’s Fund Grant in the amount of \$45,000 from the Cascade Customer Representation Sub-Fund within 30 days of receiving this Request for Payment as provided in Section 7.6 of the IFA.

Dated in Portland, Oregon, this 6th day of September, 2022.

Respectfully submitted,



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CONFIDENTIAL ATTACHMENT A
AWEC'S ELIGIBLE EXPENSES IN DOCKET UG 210755

REDACTED