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December 19, 2014

*Via Electronic Mail and Federal Express*

Public Utility Commission of Oregon  
Attn: Filing Center  
3930 Fairview Industrial Dr. SE  
P.O. Box 1088  
Salem OR 97308-1088

Re: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON  
Investigation into Treatment of Pension Costs in Utility Rates  
**Docket No. UM 1633**

Dear Filing Center:

Enclosed for filing in the above-referenced matter, please find the original and one (1) copy of the Amendment of Proposed Budget for Issue Fund Grant of the Industrial Customers of Northwest Utilities ("ICNU"). This filing updates ICNU's Amendment of Proposed Budget for Issue Fund Grant that was filed in this Docket on December 10, 2014, and which did not account for \$0.35 in ICNU's eligible expenses in this proceeding. The attached Amendment of Proposed Budget corrects the error.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,



Jesse O. Gorsuch

Enclosures

cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the attached **Amendment of Proposed Budget for Issue Fund Grant** upon all parties in this proceeding, as shown below, by causing a copy to be sent via electronic mail.

Dated at Portland, Oregon, this 19th day of December, 2014.

Sincerely,



Jesse O. Gorsuch

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**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1633**

In the Matter of	)	
	)	
THE PUBLIC UTILITY COMMISSION OF	)	<b>AMENDMENT OF PROPOSED</b>
OREGON	)	<b>BUDGET FOR ISSUE FUND</b>
	)	<b>GRANT OF THE INDUSTRIAL</b>
Investigation into Treatment of Pension Costs in	)	<b>CUSTOMERS OF NORTHWEST</b>
Utility Rates	)	<b>UTILITIES</b>
_____	)	

Pursuant to Section 6.7 of the Second Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) by Order No. 12-452 (November 7, 2012), the Industrial Customers of Northwest Utilities (“ICNU”) files this Amendment of Proposed Budget in Docket No. UM 1633 (the “Proceeding”) for an increase in its Issue Fund Grant in the amount of \$24,717.28 ICNU will bear all of its costs in this proceeding that exceed \$24,717.28.

On April 15, 2013, ICNU submitted a proposed budget showing eligible expenses of \$25,000 and seeking an Issue Fund Grant in the amount of \$20,000. ICNU sought a \$10,000 Issue Fund Grant from the 2013 PGE Issue Fund and \$10,000 from the 2013 PacifiCorp Issue Fund. On April 22, 2013, the Commission issued Order No. 13-144 approving ICNU’s proposed budget. On January 2, 2014, ICNU submitted an amended proposed budget showing eligible expenses of \$38,250, and seeking an Issue Fund Grant in the amount of \$30,600. Of that amount, ICNU requested that \$15,300 be drawn from the 2013 PGE Issue Fund, \$10,000 from the 2013 PacifiCorp Issue, and \$5,300 from the 2014 PacifiCorp Issue Fund. The Commission

approved ICNU's amended budget in Order No. 14-006 on January 9, 2014. ICNU has received final payment of all amounts in the previous Issue Fund Grants through Order Nos. 14-143 and 14-172.

ICNU is now proposing an additional amended budget showing eligible expenses of \$30,896.60, and is seeking an Issue Fund Grant in the amount of \$24,717.28. Since ICNU has unused Issue Fund Grants in UM 1689 and UE 287, ICNU requests that \$10,971.46 be re-allocated from the UE 287 Issue Fund and \$13,745.82 be reallocated from the UM 1689 Issue Fund, for a total amount of \$24,717.28.

Section 6.7 of the IFA states:

*Amendment of Proposed Budget: At any time during the proceeding, an intervenor who received Commission approval for an Issue Fund Grant may file to amend its budget and request additional funding due to unforeseen changes in the scope or complexity of issues, positions taken by other parties, changes in the schedule of the case, or other good cause. An intervenor with approved proposed budgets in multiple dockets may request to reallocate approved amounts between dockets by filing a request in both dockets.*

Likewise, Section 6.7 of the IFA states that an intervenor with approved Issue Fund Grants in multiple dockets may request to reallocate approved amounts between dockets.

The scope of this proceeding has grown considerably since ICNU submitted its original and amended proposed budgets, and has required ICNU to invest additional time and resources that were not foreseen. For example, on July 10, 2014, the administrative law judge issued a new procedural schedule in this proceeding, which provided for additional rounds of

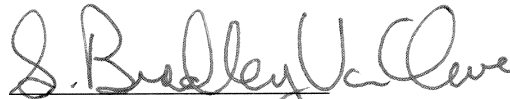
testimony, briefing and hearings. This additional phase of the case was outside the scope of the Issue Fund Grants previously approved in this Docket.

Accordingly, ICNU respectfully requests that the Commission act on this Amendment of Proposed Budget within fourteen days of receipt, as provided in Section 6.7 of the IFA, and issue an order reallocating funds from UE 287 and UM 1689 for a total Issue Fund Grant of \$24,717.28.

Dated this 19th day of December, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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UM 1633

Exhibit A

ICNU Amendment of Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	12	\$275.00	\$3,300
Associate Attorney	68	\$205.00	\$13,940
Paralegal	20	\$150.00	\$3,000
<i>Expert Witness Fees</i>			
Expert 1	58	\$170	\$9,860
<i>Other Expenses</i>			
Travel			\$400
Printing and Postage			\$396.60
Subtotal			\$30,896.60
<hr/>			
20% of ICNU Funded Expenditures			\$6,179.32
<hr/>			
<b>Total ICNU Issue Fund Request</b>			<b>\$24,717.28</b>