

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1633

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

Pursuant to Section 6.3 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 Proposed Budget in UM 1633 (the “Proceeding”) for an Issue Fund Grant in the amount of \$20,000. ICNU will bear all of its costs in this proceeding that exceed \$20,000. Since ICNU’s participation in this matter will occur primarily in 2013, the award should apply to the 2013 Portland General Electric (“PGE”) and PacifiCorp issue fund accounts. Since this case will impact the customers of PGE and PacifiCorp equally, the budget should be split between the PGE and PacifiCorp 2013 Issue Funds. ICNU respectfully requests that the Commission act on this Proposed Budget within fourteen days of receipt, as provided in Section 6.4 of the IFA. The following information is provided in accordance with Section 6.3 of the IFA:

(1) Statement of the work to be performed by ICNU for which ICNU is seeking the Issue Fund Grant:

ICNU has retained Davison Van Cleve, P.C., to represent ICNU in UM 1633.

The IFA defines an Eligible Proceeding as “any Commission proceeding that directly affects one

or more of the Participating Public Utilities . . .” IFA, Section 1(c). UM 1633 directly affects both PGE and PacifiCorp, which fall under the definition of “Participating Public Utility” in Section 1(k) of the IFA. Therefore, UM 1633 is an Eligible Proceeding, and an Issue Fund Grant may be made for this proceeding under Section 6.1 of the IFA.

ICNU will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in UM 1633. ICNU plans to conduct discovery in this proceeding. In addition, ICNU will submit expert witness testimony and briefs as called for by the procedural schedule in this Docket.

(2) Description of the areas to be investigated by ICNU:

ICNU intends to participate in all phases of this proceeding to determine the appropriate method for including pension costs in utility rates. The treatment of pension costs is an important policy issue for the Commission to consider. ICNU has knowledge and expertise that may assist the Commission in resolving the issues in the proceeding.

(3) Description of the particular customer class or classes that will benefit from the intervenor’s participation:

ICNU’s participation will directly benefit industrial customers, as well as all other large non-residential customers of PGE and PacifiCorp.

(4) Identification of the specific Fund account from which ICNU is seeking the Issue Fund Grant and Available Funds:

ICNU is seeking an Issue Fund Grant in the amount of \$10,000 from the 2013 PGE Issue Fund, and \$10,000 from the 2013 PacifiCorp Issue Fund. ICNU will bear the cost of its participation to the extent that its costs exceed the amount requested. However, in the event

that the Commission elects to modify the scope of this proceeding, ICNU reserves the right to file a request to amend its budget.

ICNU estimates that the amount available in the PGE Issue Fund Account for 2013 is \$220,948.33, and that the amount available in the PacifiCorp Issue Fund Account for 2013 is \$132,143.00.

(5) Budget showing estimated attorney and consultant fees and expert witness fees:

Attached as Exhibit A is ICNU's proposed budget in UM 1633.

(6) Matching Funds

ICNU represents that it will use matching fund resources to pay at least 20% of the Eligible Expenses for which ICNU is seeking an Issue Fund Grant. As such, ICNU seeks an issue fund grant for 80% of its proposed budget in this proceeding.

Basis for Request

ICNU respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$10,000 from the PacifiCorp 2013 Issue Fund and \$10,000 from the 2013 PGE Issue Fund based on the following considerations:

1. ICNU represents the interests of industrial customers and has significant experience participating in Commission proceedings involving the Commission, PacifiCorp, and PGE. In addition, ICNU has participated in numerous previous cases involved in setting rates for PGE and PacifiCorp. Thus, ICNU possesses significant interest and expertise with respect to this proceeding. ICNU's participation will benefit all PGE and PacifiCorp industrial and large non-residential customers.

2. ICNU has been precertified under Sections 5.1 and 5.2 of the IFA and OAR § 860-001-0120(3)(b), as eligible to receive an Issue Fund Grant, by Commission Order No. 03-502, which was entered on August 21, 2003.

Therefore, ICNU respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount specified above.

Dated this 15th day of April, 2013.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

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Of Attorneys for Industrial Customers
of Northwest Utilities

UM 1633

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	20	\$240.00	\$4,800
Associate Attorney	32	\$195.00	\$6,240
Paralegal	15	\$125.00	\$1,875
<i>Expert Witness Fees</i>			
Expert 1	75	\$150	\$11,250
<i>Other Expenses</i>			
Travel			\$335
Printing and Postage			\$500
Subtotal			\$25,000
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20% of ICNU Funded Expenditures			\$5,000
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Total ICNU PacifiCorp Issue Fund Grant Proposed Budget			\$10,000
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Total ICNU PGE Issue Fund Grant Proposed Budget			\$10,000
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Total ICNU Issue Fund Request			\$20,000

Davison Van Cleve PC

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April 15, 2013

Via Electronic and US Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

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 please find the original and one (1) copy of the Proposed Budget on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Thank you for your assistance.

Sincerely,

/s/ Sarah A. Kohler
Sarah A. Kohler

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Proposed Budget on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail.

Dated at Portland, Oregon, this 15th day of April, 2013.

Sincerely,

/s/ Sarah A. Kohler
Sarah A. Kohler

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