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April 18, 2014

Via Electronic Mail and Federal Express

Public Utility Commission of Oregon
Attn: Filing Center
3930 Fairview Industrial Drive SE
Salem OR 97302

Re: In the Matter of PORTLAND GENERAL ELECTRIC
Request for a General Rate Revision
Docket No. UE 283

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of the Proposed Budget for Issue Fund Grant of the Industrial Customers of Northwest Utilities.

Thank you for your assistance, and please do not hesitate to contact our office if you have any questions.

Sincerely,



Jesse O. Gorsuch

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the attached Proposed Budget for Issue Fund Grant upon all parties in this proceeding by sending a copy via electronic mail to the following parties at the following addresses.

Dated at Portland, Oregon, this 18th day of April, 2014.



Jesse O. Gorsuch

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 283

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PROPOSED BUDGET FOR
COMPANY)	ISSUE FUND GRANT OF THE
)	INDUSTRIAL CUSTOMERS OF
Request for a General Rate Revision.)	NORTHWEST UTILITIES
_____)	

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 Docket No. UE 283 (the “Proceeding”) for an Issue Fund Grant in the amount of \$67,212. ICNU will bear all of its costs in this proceeding that exceed ICNU’s proposed budget. ICNU proposes that this grant be funded from the Portland General Electric (“PGE”) Issue Fund Account. 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 UE 283. 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). UE 283 directly affects PGE, which falls under the definition of “Participating Public Utility” in Section 1(k) of the IFA.

Therefore, UE 283 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 UE 283. 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 investigate cost of capital, rate spread/rate design, Port Westward 2 prudence, rate treatment of pension costs, environmental remediation costs, RPS deferrals, and any other issues identified through discovery.

(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.

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

ICNU proposes a total budget of \$84,015; and, ICNU is seeking an Issue Fund Grant in the amount of \$67,212. ICNU will bear the costs of its participation to the extent that its costs exceed the proposed budget. 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 currently available in the PGE Issue Fund Account for 2014 is \$146,870.51. This amount reflects the fact that CUB has already been

granted Issue Fund Grants from the 2014 PGE Issue Fund in the amount of \$28,333. Further, ICNU recently released \$12,379.73 in Docket No. UE 266 and \$1,409.50 in Docket No. UM 1616 back to the PGE Issue Fund. These amounts are not reflected in the OPUC's current estimate of the amount available in the 2014 PGE Issue Fund. Since these funds were allocated for ICNU's use in 2013, CUB has agreed it is appropriate to allocate these funds for ICNU's use in 2014. In addition, CUB and ICNU have agreed that it is appropriate to split the 2014 PGE Issue Fund amount of \$175,203.51, which was the amount available before CUB's 2014 Issue Fund requests were granted. Therefore, the total amount available for use by ICNU is \$101,390.98.

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

Attached as Exhibit A is ICNU's proposed budget in UE 283.

(6) Matching Funds

As required by Section 6.3(f) of the IFA, ICNU represents that it will use matching fund resources in the form of either in-house resources or outside funding to account for or 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. ICNU's proposed budget assumes a fully litigated case. If the case is settled prior to hearing, actual expenses could be lower.

Basis for Request

ICNU respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$67,212 based on the following considerations:

1. In this proceeding, PGE is proposing an approximately \$81.5 million, or 4.6% average, rate increase by the middle of 2015. The large size of this rate increase warrants considerable scrutiny. In addition, the case raises important questions of policy and fact.

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

3. 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 18th day of April, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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Of Attorneys for Industrial Customers
of Northwest Utilities

UE 283

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	50	\$ 275	\$13,750
Associate Attorney	70	\$ 205	\$14,350
Paralegal	30	\$150	\$4,500
<i>Expert Witness Fees</i>			
Expert 1	200	\$150	\$29,920
Expert 2	93	\$215	\$19,995
<i>Other Expenses</i>			
Travel			\$1,000
Printing and Postage			\$500
Subtotal			\$84,015
<hr/>			
20% of ICNU Funded Expenditures			\$16,803
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Total ICNU PGE Issue Fund Grant Proposed Budget			\$67,212
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Total ICNU Issue Fund Request			\$67,212