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Suite 400
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August 29, 2014

Via E-mail and Federal Express

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

Re: PACIFICORP dba PACIFIC POWER
Application for Approval of Deferred Accounting and Prudence Determination
Associated with the Energy Imbalance Market
Docket No. UM 1689

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of the Request for Partial Payment of Issue Fund Grant and Confidential Exhibit A on behalf of the Industrial Customers of Northwest Utilities. Pursuant to Section 7.3 of the Intervenor Funding Agreement, Confidential Exhibit A is being submitted in a separate sealed envelope to the Commission and PacifiCorp.

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

Sincerely,



Jesse O. Gorsuch

Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the attached **Request for Partial Payment of 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 29th day of August, 2014.



Jesse O. Gorsuch

(W) CITIZENS' UTILITY BOARD OF OREGON

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1689

In the Matter of)	
)	
PACIFICORP d/b/a PACIFIC POWER)	REQUEST FOR PARTIAL
)	PAYMENT OF ISSUE FUND
Application for Approval of Deferred)	GRANT OF THE INDUSTRIAL
Accounting and Prudence Determination)	CUSTOMERS OF NORTHWEST
Associated with the Energy Imbalance Market)	UTILITIES
)	

Pursuant to Section 7.3 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”) hereby requests partial payment of ICNU’s Issue Fund Grant in Docket No. UM 1689 in the amount of \$14,712.90.

On May 28, 2014, ICNU filed a Proposed Budget for an Issue Fund Grant in Docket No. UM 1689 in the amount of \$29,000. On May 28, 2014, the Commission issued Order No. 14-186 approving an Issue Fund Grant for ICNU in the amount of \$29,000. At this time, ICNU requests partial payment of the approved Issue Fund Grant in Docket No. UM 1689.

ICNU hereby requests that the Commission authorize partial payment of the Issue Fund Grant in the amount of \$14,712.90. ICNU’s expenses are shown in Confidential Attachment A.

This Request for Payment satisfies the requirements of the IFA as follows:

Section 7.3(a) – The itemized expenses, payees, and hourly rates are attached as Confidential Exhibit A.

Section 7.3(b) – ICNU has been an active participant in this Docket. ICNU has

conducted discovery, participated in settlement conferences, filed testimony and entered into a stipulation. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU's participation in UM 1689.

Section 7.3(c) – The Commission approved ICNU's proposed budget on May 28, 2014. In addition, ICNU used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA.

Section 7.3(d) - This Request for Payment constitutes a Partial Request for Payment in this Docket.

Section 7.4 – All of the expenses included in Exhibit A are Eligible Expenses as defined in Section 7.4 of the IFA because they relate to services provided or expenses incurred by ICNU's outside legal counsel and expert witnesses. Relevant non-privileged documents substantiating the Eligible Expenses in Confidential Exhibit A are available for Commission audit, if requested, pursuant to Section 7.10 of the IFA.

The IFA provides that the granting of “an Issue Fund Grant shall constitute a binding obligation on the Commission to order reimbursement of Eligible Expenses.” IFA § 6.5. Likewise, the intervenor funding rules adopted by the Commission provide that “[t]he terms of an [intervenor funding] agreement are binding on all organizations seeking a grant under that agreement and will be followed by the Commission in administering the agreement.” OAR § 860-001-0120(2). ICNU has satisfied the terms of the IFA and respectfully requests that the Commission approve partial payment of ICNU's Issue Fund Grant in the amount of \$14,712.90 from the 2014 PacifiCorp Issue Fund within 30 days of receiving this Request for Partial Payment as provided in Section 7.6 of the IFA.

Payment should be sent to:

Industrial Customers of Northwest Utilities
c/o S. Bradley Van Cleve
Davison Van Cleve, P.C.
333 SW Taylor, Suite 400
Portland, OR 97204

Dated this 29th day of August, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

A handwritten signature in cursive script, reading "S. Bradley Van Cleve". The signature is written in black ink and is positioned above the printed name.

S. Bradley Van Cleve

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Of Attorneys for Industrial Customers
of Northwest Utilities