

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com
Suite 400
333 S.W. Taylor
Portland, OR 97204

March 27, 2014

Via Electronic Filing

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 294

Dear Filing Center:

Attached for filing in the above-captioned proceeding, please find the Proposed Budget for Issue Fund Grant of the Industrial Customers of Northwest Utilities.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 294

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 294 (the “Proceeding”) for an Issue Fund Grant in the amount of \$54,552. If additional PGE Issue Funds become available, ICNU reserves the right to file an amended proposed budget and request an additional Issue Fund Grant. 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 294. 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 294 directly affects PGE,

which falls under the definition of “Participating Public Utility” in Section 1(k) of the IFA. Therefore, UE 294 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 294, and 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 numerous aspects of PGE’s 2015 general rate case, including PGE’s cost of capital, rate spread/rate design, return on equity, power costs, adjustments to Schedule 25, prudence of the Carty Generating Station, pricing proposals for large customers, 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 \$150,330, and is seeking an Issue Fund Grant in the amount of \$54,552. ICNU is limiting its Issue Fund request due to the limited funds available in the 2015 PGE Issue Fund. ICNU has coordinated with the Citizens’ Utility Board in preparing this proposed budget. ICNU estimates that the amount currently available in the PGE Issue Fund Account for 2015 is \$118,604.81.

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

Attached as Exhibit A is ICNU's proposed budget in UE 294.

(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. 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 \$54,552 based on the following considerations:

1. In this proceeding, PGE is proposing an approximately \$66 million, or 3.7% average, rate increase effective January 1, 2016. The projected rate increase for ICNU's members is significant and 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 related to 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 27th day of March, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

S. Bradley Van Cleve

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

bvc@dvclaw.com

Of Attorneys for Industrial Customers
of Northwest Utilities

UE 294

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	100	\$ 275	\$27,500
Associate Attorney	175	\$ 205	\$35,875
Paralegal	30	\$150	\$4,500
<i>Expert Witness Fees</i>			
Expert 1	200	\$170	\$34,000
Expert 2	100	\$215	\$21,500
Expert 3	129	\$195	\$25,155
<i>Other Expenses</i>			
Travel			\$1,000
Printing and Postage			\$800
Subtotal			\$150,330
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Percentage of Expenditures Funded by ICNU			64%
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Total ICNU Issue Fund Request			\$54,552