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August 15, 2016

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC CO.
2017 Annual Power Cost Update Tariff
Docket No. UE 308

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the Request for Amendment of Proposed Budget and 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

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 308

In the Matter of)	
)	REQUEST FOR AMENDMENT OF
PORTLAND GENERAL ELECTRIC)	PROPOSED BUDGET AND ISSUE
COMPANY)	FUND GRANT OF THE INDUSTRIAL
)	CUSTOMERS OF NORTHWEST
2017 Annual Power Cost Update Tariff)	UTILITIES
)	

Pursuant to Section 6.3 of the Third Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) by Order No. 15-335 (October 20, 2015), the Industrial Customers of Northwest Utilities (“ICNU”) files this Request for Amendment of Proposed Budget in Docket No. UE 308 (the “Proceeding”) for an increase of \$7,837.03 to its Issue Fund Grant for a new grant amount of \$38,061.03.

On May 18, 2016, ICNU submitted a proposed budget showing eligible expenses of \$37,780 and seeking an Issue Fund Grant in the amount of \$30,224. ICNU sought a \$17,676.20 Issue Fund Grant from the 2016 PGE Issue Fund and \$12,547.80 in reallocated funds from Docket No. UM 1719. On May 24, 2016, the Commission approved ICNU’s proposed budget by Order No. 16-201.

ICNU is now proposing an amendment to its budget showing eligible expenses of \$47,576.29, and is seeking an Issue Fund Grant in the amount of \$38,061.03. Since ICNU has unused Issue Fund Grants in Docket Nos. UM 1632 and UM 1755, ICNU requests that

\$6,412.53 be reallocated from the UM 1623 Issue Fund Grant and \$1,424.50 be reallocated from the UM 1755 Issue Fund Grant for use in this proceeding.

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.

ICNU expects that its participation in this docket will require additional time and resources that were not foreseen, and which were not outlined in its original proposed budget in this proceeding. While the parties have settled some issues in this proceeding, it appears that other issues will go to hearing.

Pursuant to Section 6.7 of the IFA, ICNU is filing requests for final payment in Docket Nos. UM 1623 and UM 1755 at the same time it files this Request for Amendment of Proposed Budget.

Accordingly, ICNU respectfully requests that the Commission act on this Request for 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 UM 1623 and UM 1755 for a total Issue Fund Grant of \$38,061.03.

Dated this 15th day of August, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

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Of Attorneys for Industrial Customers
of Northwest Utilities

UE 308

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	6	\$295	\$1,770
Associate Attorney	86	\$265	\$22,790
Paralegal	35	\$170	\$5,950
<i>Expert Witness Fees</i>			
Expert 1	105	\$160	\$16,800
<i>Other Expenses</i>			
Travel			\$191.29
Printing and Postage			\$75
Subtotal			\$47,576.29
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20% of ICNU Funded Expenditures			\$9,515.26
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Total ICNU PGE Issue Fund Request			\$17,676.20
Reallocation from UM 1719			\$12,547.80
Reallocation from UM 1623			\$6,412.53
Reallocation from UM 1755			\$1,424.50
Total ICNU Issue Fund Request			\$38,061.03