

Davison Van Cleve PC

Attorneys at Law

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

November 8, 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.
2016 Integrated Resource Plan
Docket No. LC 66

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the Request for Issue Fund Grant and Proposed Budget 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**

LC 66

In the Matter of)	
)	REQUEST FOR ISSUE FUND GRANT
PORTLAND GENERAL ELECTRIC)	AND PROPOSED BUDGET
COMPANY)	OF THE INDUSTRIAL CUSTOMERS
)	OF NORTHWEST UTILITIES
2016 Integrated Resource Plan.)	
_____)	

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 Proposed Budget in Docket No. LC 66 (the “Proceeding”) for an Issue Fund Grant in the amount of \$26,566.05. ICNU proposes that \$21,000 of this grant be drawn from the 2017 Portland General Electric (“PGE”) Issue Fund Account. Because ICNU has unused funds in its UE 308 Issue Fund Grant, ICNU also requests that \$5,566.05 be reallocated from its UE 308 Issue Fund Grant for use in this proceeding, for a total request of \$26,566.05. 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 LC 66. 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). LC 66 directly affects PGE, which falls under the definition of “Participating Public Utility” in Section 1(k) of the IFA. Therefore, LC 66 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 stakeholder workshops and public meetings in LC 66, and plans to conduct discovery in this proceeding. In addition, ICNU will submit comments as called for by the procedural schedule in this Docket.

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

ICNU intends to examine numerous aspects of PGE’s 2016 Integrated Resource Plan (“IRP”), including PGE’s resource need, action plan, modeling assumptions, capacity deficit, and any other issues identified during 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 \$33,207.56 and is seeking an Issue Fund Grant from the 2017 PGE Issue Fund Account in the amount of \$21,000. In addition, in accordance with Section 6.7 of the IFA, ICNU requests reallocation of funds from its UE 308 Issue Fund Grant in the amount of \$5,566.05, for a total request of \$26,566.05. ICNU will bear the costs of its participation to the extent that its costs exceed the proposed budget. However, in the event there are changes in the scope or complexity of the issues or positions taken by other parties,

changes in the schedule of the case, or other good cause, 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 2017 is \$143,764.85.

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

Attached as Exhibit A is ICNU's proposed budget in LC 66.

(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 and reallocate funds from its UE 308 Issue Fund Grant in the total amount of \$26,566.05, based on the following considerations:

1. 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 involving PGE's IRP. 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.

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 8th day of November, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Of Attorneys for Industrial Customers
of Northwest Utilities

LC 66

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	3	\$295	\$885
Associate Attorney	58	\$265	\$15,370
Paralegal	21	\$170	\$3,570
<i>Expert Witness Fees</i>			
Expert 1	82	\$160	\$13,120
<i>Other Expenses</i>			
Travel			\$150
Printing and Postage			\$112.56
Subtotal			\$33,207.56
20% of ICNU Funded Expenditures			\$6,641.51
Total ICNU PGE Issue Fund Request			\$21,000
Reallocation from UE 308			\$5,566.05
Total ICNU Issue Fund Request			\$26,566.05