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February 24, 2017

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 Request for a General Rate Revision
Docket No. UE 319

Dear Filing Center:

Please find enclosed the Notice of Intent to Request Issue Fund Grant and the Request for Issue Fund Grant and Proposed Budget of the Industrial Customers of Northwest Utilities in the above-referenced docket.

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 319

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

The Industrial Customers of Northwest Utilities (“ICNU”) files this Notice of Intent to Request an Issue Fund Grant in consolidated Docket No. UE 319, pursuant to OAR § 860-001-0120 and the Third Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 15-335 (October 20, 2015).

1. On February 17, 2017, Portland General Electric (“PGE” or the “Company”) notified the Commission that PGE would file its 2017 Request for a General Rate Revision by the end of this month. The Commission docketed the filing as UE 319.

2. UE 319 is an Eligible Proceeding under the IFA. 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 319 will directly affect PGE, which is a Participating Public Utility under Section 1(k) of the IFA. Therefore, an Issue Fund Grant may be made for this proceeding under Section 6.1 the IFA.

3. As required by Section 6.2 of the IFA, this Notice of Intent is being filed at the time ICNU is requesting intervention in UE 319.

4. As required by Section 6.2 of the IFA, this Notice of Intent is being served on each affected Participating Public Utility, all precertified organizations, and all parties identified on the service list for UE 319.

5. ICNU identifies the PGE Issue Fund Account as the account from which ICNU intends to request the Issue Fund Grant.

6. 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.

7. Pursuant to Section 6.3 of the IFA, ICNU files this Proposed Budget in Docket No. UE 319 (the “Proceeding”) for an Issue Fund Grant in the amount of \$46,000. 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 drawn from the 2017 PGE Issue Fund Account and 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 319. 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 319 directly affects PGE, which falls under the definition of “Participating Public Utility” in Section 1(k) of the IFA. Therefore, UE 319 is an Eligible Proceeding, and an Issue Fund Grant may be made for this proceeding under Section 6.1 of the IFA.

PAGE 2 – PROPOSED BUDGET FOR ISSUE FUND GRANT OF ICNU

ICNU will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in UE 319, 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 2017 general rate case, including PGE's cost of capital, rate spread/rate design, return on equity, power costs, general revenue requirement issues, 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 \$57,500, and is seeking an Issue Fund Grant in the amount of \$46,000. ICNU estimates that the amount currently available in the PGE Issue Fund Account for 2017 is \$46,667.85.

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

Attached as Exhibit A is ICNU's proposed budget in UE 319.

(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 \$46,000, based on the following considerations:

1. This proceeding will be dedicated to revising PGE's rates it charges its customers, including ICNU's members. Any such revision to PGE's rates may significantly impact ICNU's members 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 24th day of February, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for Industrial Customers
of Northwest Utilities

UE 319

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	10	\$295	\$2,950
Attorney	98	\$265	\$25,970
Paralegal	30	\$170	\$5,100
<i>Expert Witness Fees</i>			
Expert 1	116	\$200	\$23,200
<i>Other Expenses</i>			
Travel			\$200
Printing and Postage			\$80
Subtotal			\$57,500
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20% of ICNU Funded Expenditures			\$11,500
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Total ICNU PGE Issue Fund Grant Proposed Budget			\$46,000
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Total ICNU Issue Fund Request			\$46,000