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April 4, 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 PACIFICORP, dba PACIFIC POWER  
2018 Transition Adjustment Mechanism  
**Docket No. UE 323**

Dear Filing Center:

Enclosed please find 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 matter.

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 323**

In the Matter of  PACIFICORP, dba PACIFIC POWER  2018 Transition Adjustment Mechanism. <hr/>	) NOTICE OF INTENT TO REQUEST ISSUE ) FUND GRANT AND REQUEST FOR ) ISSUE FUND GRANT AND PROPOSED ) BUDGET OF THE INDUSTRIAL ) CUSTOMERS OF NORTHWEST ) UTILITIES
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The Industrial Customers of Northwest Utilities (“ICNU”) files this Notice of Intent to Request an Issue Fund Grant in Docket No. UE 323, 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 March 31, 2017, PacifiCorp (or the “Company”) filed Advice No. 17-002, the Company’s 2018 Transition Adjustment Mechanism (“TAM”). The Commission docketed this proceeding as UE 323.

2. UE 323 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 323 will directly affect PacifiCorp, 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 323.

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 323.

5. ICNU identifies the PacifiCorp 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 323 for an Issue Fund Grant in the amount of \$20,000. 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 Docket No. UE 323. 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 323 directly affects PacifiCorp, which falls under the definition of “Participating Public Utility” in Section 1(k) of the IFA. Therefore, UE 323 is an Eligible Proceeding, and an Issue Fund Grant may be made for this proceeding under Section 6.1 of the IFA.

ICNU plans to attend any settlement conferences, workshops, public meetings, oral presentations and hearings in UE 323. ICNU also plans to conduct and/or review discovery

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in these proceedings. In addition, ICNU plans to 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 PacifiCorp's 2018 TAM, including PacifiCorp's power costs, direct access credits and associated issues, gas hedges, production tax credits, and the impact of PacifiCorp's participation in the energy imbalance market. In addition, ICNU will review any other issues raised by PacifiCorp's filing or by other parties.

**(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 PacifiCorp.

**(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 at least \$25,000, and is seeking an Issue Fund Grant in the amount of \$20,000. ICNU will bear the costs of its participation to the extent that its costs exceed the proposed budget. However, if the Commission elects to modify the scope of this proceeding, ICNU reserves the right to file a request to amend its budget.

ICNU estimates that the amount currently available in the PacifiCorp Issue Fund Account for 2017 is \$59,164.03.

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

Attached as Exhibit A is ICNU's proposed budget in Docket No. UE 323.

**(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. As such, ICNU seeks an Issue Fund Grant for 80% of its proposed budget in this proceeding. 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 \$20,000, based on the following considerations:

1. In this proceeding, PacifiCorp has proposed an \$18.4 million, or 1.5 percent, annual rate increase.
2. ICNU represents the interests of industrial customers and has significant experience participating in Commission proceedings involving PacifiCorp's power costs. ICNU filed power cost testimony in all of PacifiCorp's past TAM cases, including Docket No. UE 307, PacifiCorp's most recent TAM proceeding. Thus, ICNU possesses significant interest and expertise with respect to the subject matter in this proceeding. ICNU's participation will benefit all of PacifiCorp's 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 4th day of April, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Jesse E. Cowell

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Of Attorneys for Industrial Customers  
of Northwest Utilities

UE 323

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Attorney	45	\$265	\$11,925
Paralegal/Law Clerk	20	\$170	\$3,400
<i>Expert Witness Fees</i>			
Expert	59	\$160	\$9,440
Travel			\$175
Printing and Postage			\$60
Subtotal			\$25,000
20% of ICNU Funded Expenditures			\$5,000
<b>Total ICNU PacifiCorp Issue Fund Request</b>			<b>\$20,000</b>