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February 14, 2018

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 COMPANY,
Draft Storage Potential Evaluation
Docket Nos. UM 1856

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.

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**

UM 1856

In the Matter of)	NOTICE OF INTENT TO REQUEST
)	ISSUE FUND GRANT AND REQUEST
PORTLAND GENERAL ELECTRIC)	FOR ISSUE FUND GRANT AND
COMPANY)	PROPOSED BUDGET OF THE
)	INDUSTRIAL CUSTOMERS OF
Energy Storage Proposals and Revised Energy)	NORTHWEST UTILITIES
<u>Storage Potential Evaluation.</u>)	

The Industrial Customers of Northwest Utilities (“ICNU”) files this Notice of Intent to Request an Issue Fund Grant in Docket No. UM 1856, pursuant to OAR § 860-001-0120 and the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 18-020 (January 17, 2018).

1. On July 14, 2017, Portland General Electric (“PGE” or the “Company”) filed its Draft Storage Potential Evaluation. The Commission docketed the filing as UM 1856.

2. As argued in ICNU’s motion accompanying this filing, UM 1856 is an Eligible Proceeding for Issue Funds under the IFA. The IFA defines an Eligible Proceeding for Issue Funds as, among other things, any “proceeding ... that directly affects one or more of the Participating Utilities and is anticipated to have a substantial impact on utility rates or service, a significant impact on utility customers or the operations of the utility, [or] is likely to result in significant change in regulatory policy....” IFA, Article 1(c). UM 1856 will directly affect PGE, which is a Participating Public Utility under Article 1(n) of the IFA, and UM 1856 is

anticipated to have a substantial impact on PGE's rates and service, and therefore on customers like ICNU that are served by PGE. Accordingly, an Issue Fund Grant may be made for this proceeding under Article 6.1 the IFA.

3. Article 6.2 of the IFA requires that an intervenor seeking an Issue Fund Grant file a Notice of Intent to Request an Issue Fund Grant at the time it files its intervention. At the time ICNU filed its petition to intervene in this Docket, on November 3, 2017, the current IFA had not yet been negotiated between the parties or approved by the Commission. Accordingly, ICNU respectfully requests a waiver of this noticing requirement.

4. Article 6.3 of the IFA requires that an intervenor seeking an Issue Fund Grant file a proposed budget within 30 days after the prehearing conference at which the schedule for the proceeding is established. The prehearing conference in this docket was held on November 30, 2017. Again, the current IFA had not yet been approved by the Commission by the 30-day deadline for submitting proposed budgets. ICNU has submitted this request within 30 days of the Commission order approving the current IFA (January 17, 2018) and respectfully requests a waiver of this requirement as well.

5. As required by Article 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 UM 1856.

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

7. ICNU has been precertified under Articles 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.

8. Pursuant to Article 6.3 of the IFA, ICNU files this Proposed Budget in Docket No. UM 1856 (the “Proceeding”) for an Issue Fund Grant in the amount of \$20,000. 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 2018 PGE Issue Fund Account and respectfully requests that the Commission act on this Proposed Budget within fourteen days of receipt, as provided in Article 6.4 of the IFA. The following information is provided in accordance with Article 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 UM 1856. As argued in ICNU’s motion accompanying this filing, UM 1856 is an Eligible Proceeding for Issue Funds under the IFA. The IFA defines an Eligible Proceeding for Issue Funds as, among other things, any “proceeding ... that directly affects one or more of the Participating Utilities and is anticipated to have a substantial impact on utility rates or service, [or] is likely to result in significant change in regulatory policy....” IFA, Article 1(c). UM 1856 will directly affect PGE, which is a Participating Public Utility under Article 1(n) of the IFA, and UM 1856 is anticipated to have a substantial impact on PGE’s rates and service, and therefore on customers like ICNU that are served by PGE. Accordingly, an Issue Fund Grant may be made for this proceeding under Article 6.1 the IFA.

ICNU will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in UM 1856, 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 Draft Storage Potential Evaluation, including the merits and drawbacks of the modeling tools outlined in PGE's draft evaluation, the costs of its proposed energy storage technologies, 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 \$25,000 and is seeking an Issue Fund Grant in the amount of \$20,000. ICNU estimates that the amount currently available in the PGE Issue Fund Account for 2018 is \$143,750.

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

Attached as Exhibit A is ICNU's proposed budget in UM 1856.

(6) Matching Funds

As required by Article 6.3(g) 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 \$20,000, based on the following considerations:

1. The costs required to achieve the benefits outlined in PGE's draft storage evaluation could substantially impact the rates PGE 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 Articles 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 14th day of February, 2018.

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

UM 1856

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	36	\$280	\$10,080
Attorney	13	\$225	\$2,925
Paralegal	10	\$170	\$1,700
<i>Expert Witness Fees</i>			
Expert 1	50	\$200	\$10,000
<i>Other Expenses</i>			
Travel			\$215
Printing and Postage			\$80
Subtotal			\$25,000
20% of ICNU Funded Expenditures			\$5,000
Total ICNU PGE Issue Fund Grant Proposed Budget			\$20,000
Total ICNU Issue Fund Request			\$20,000