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June 24, 2016

## *Via Electronic Filing and Federal Express*

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

Re: PACIFICORP, dba PACIFIC POWER  
Petition for Approval of the 2017 PacifiCorp Inter-Jurisdictional  
Allocation Protocol  
**Docket No. UM 1050**

Dear Filing Center:

Enclosed for filing in the above-captioned proceeding, please find the Request for Final Payment of Issue Fund Grant and Confidential Exhibit A on behalf of the Industrial Customers of Northwest Utilities.

Pursuant to Section 7.3 of the Intervenor Funding Agreement, Confidential Exhibit A is being submitted in a separate sealed envelope to the Commission and PacifiCorp.

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  
cc: R. Bryce Dalley

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1050**

In the Matter of	)	REQUEST FOR FINAL PAYMENT OF
	)	ISSUE FUND GRANT OF THE
PACIFICORP, dba PACIFIC POWER,	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
Petition for Approval of the 2017 PacifiCorp	)	
<u>Inter-Jurisdictional Allocation Protocol.</u>	)	

Pursuant to Section 7.3 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”) hereby requests final payment of ICNU’s Issue Fund Grant in Docket No. UM 1050 in the amount of \$40,000.

On March 7, 2016, ICNU filed a Proposed Budget for an Issue Fund Grant in Docket No. UM 1050 in the amount of \$40,000. On March 8, 2016, the Commission issued Order No. 16-104, approving an Issue Fund Grant for ICNU in the amount of \$40,000. At this time, ICNU requests final payment of the approved Issue Fund Grant in Docket No. UM 1050.

ICNU hereby requests that the Commission authorize final payment of the Issue Fund Grant in the amount of \$40,000. ICNU’s expenses are shown in Confidential Attachment A.

This Request for Payment satisfies the requirements of the IFA as follows:

**Section 7.3(a)** – The itemized expenses, payees, and hourly rates are attached as Confidential Exhibit A.

**Section 7.3(b)** – ICNU has been an active participant in this Docket. ICNU has conducted discovery, participated in settlement discussions, participated in the hearing, and filed testimony and a brief. The expenses included in Confidential

Exhibit A are reasonable and directly attributable to ICNU's participation in UM 1050.

**Section 7.3(c)** – The Commission approved ICNU's proposed budget on March 8, 2016. In addition, ICNU used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA.

**Section 7.3(d)** - This Request for Payment constitutes a Final Request for Payment in this Docket.

**Section 7.4** – All of the expenses included in Exhibit A are Eligible Expenses as defined in Section 7.4 of the IFA because they relate to services provided or expenses incurred by ICNU's outside legal counsel and expert witnesses. Relevant non-privileged documents substantiating the Eligible Expenses in Confidential Exhibit A are available for Commission audit, if requested, pursuant to Section 7.10 of the IFA.

The IFA provides that the granting of an Issue Fund Grant “shall constitute a binding obligation on the Commission to order reimbursement of Eligible Expenses.” IFA § 6.5. Likewise, the intervenor funding rules adopted by the Commission provide that “[t]he terms of an [intervenor funding] agreement are binding on all organizations seeking a grant under that agreement and will be followed by the Commission in administering the agreement.” OAR § 860-001-0120(2). ICNU has satisfied the terms of the IFA and respectfully requests that the Commission approve final payment of ICNU's Issue Fund Grant in the amount of \$40,000 from the 2016 PacifiCorp Issue Fund within 30 days of receiving this Request for Final Payment, as provided in Section 7.6 of the IFA.

Payment should be sent to:

Industrial Customers of Northwest Utilities  
c/o S. Bradley Van Cleve  
Davison Van Cleve, P.C.  
333 SW Taylor, Suite 400  
Portland, OR 97204

Dated this 24th day of June, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

S. Bradley Van Cleve

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Of Attorneys for Industrial Customers  
of Northwest Utilities