

# Davison Van Cleve PC

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November 19, 2014

***Via E-Mail and Federal Express***

Public Utility Commission of Oregon  
Attn: Filing Center  
3930 Fairview Industrial Drive SE  
Salem OR 97302

Re: In the Matter of PORTLAND GENERAL ELECTRIC  
Net Variable Power Costs (NVPC) and  
Annual Power Cost Update (APCU)  
**Docket No. UE 286**

Dear Filing Center:

Enclosed please find the original and one (1) copy of 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 Portland General Electric.

Thank you for your assistance. If you have any questions, please do not hesitate to contact our office.

Sincerely,



Jesse O. Gorsuch

Enclosures

cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the attached **Request for Final Payment of Issue Fund Grant** upon all parties in this proceeding by sending a copy via electronic mail to the following parties at the following addresses.

Dated at Portland, Oregon, this 19th day of November, 2014.

  
Jesse O. Gorsuch

**(W) CITIZENS' UTILITY BOARD OF OREGON**  
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**(W) OREGON PUBLIC UTILITY COMMISSION**  
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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 286**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	<b>REQUEST FOR FINAL</b>
COMPANY	)	<b>PAYMENT OF ISSUE FUND</b>
	)	<b>GRANT OF THE INDUSTRIAL</b>
	)	<b>CUSTOMERS OF NORTHWEST</b>
Net Variable Power Costs (NVPC) and	)	<b>UTILITIES</b>
Annual Power Cost Update (APCU)	)	
_____	)	

Pursuant to Section 7.3 of the Second Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) by Order No. 12-452 (November 7, 2012), the Industrial Customers of Northwest Utilities (“ICNU”) hereby requests final payment of ICNU’s Issue Fund Grant in Docket No. UE 286 in the amount of \$1,256.66.

On April 18, 2014, ICNU filed a Proposed Budget for an Issue Fund Grant in Docket No. UE 286 in the amount of \$30,434. On April 29, 2014, the Commission issued Order No. 14-139 approving an Issue Fund Grant for ICNU in the amount of \$30,434. On August 29, 2014, ICNU filed a Request for Partial Payment of Issue Fund Grant in the amount of \$28,980.61, which the Commission approved in Order No. 14-309 on September 3, 2014. At this time, ICNU requests final payment of the approved Issue Fund Grant in Docket No. UE 286 in the amount of \$1,256.66. Following payment of this amount, the amount remaining in the Issue Fund for this Docket will be \$196.73. ICNU releases this amount for return to the PGE Issue Fund.

ICNU hereby requests that the Commission authorize final payment of the Issue Fund Grant in the amount of \$1,256.66. 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 conferences, filed testimony, and entered into settlement stipulations. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU's participation in UE 286.

**Section 7.3(c)** – The Commission approved ICNU's proposed budget on April 29, 2014. 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 \$1,256.66

from the 2014 PGE Issue Fund within 30 days of receiving this Request for Final Payment as provided in Section 7.6 of the IFA.

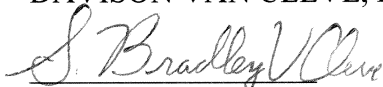
Payment should be sent to:

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 19<sup>th</sup> day of November, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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