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February 17, 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
2017 Transition Adjustment Mechanism
Docket No. UE 307

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find 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**

UE 307

In the Matter of)	REQUEST FOR ISSUE FUND GRANT
)	AND PROPOSED BUDGET
PACIFICORP, dba PACIFIC POWER)	OF THE INDUSTRIAL CUSTOMERS
)	OF NORTHWEST UTILITIES
2017 Transition Adjustment Mechanism)	
_____)	

Pursuant to Section 6.3 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”) files this Proposed Budget in Docket No. UE 307 (the “Proceeding”) for an Issue Fund Grant in the amount of \$8,768. 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 UE 307. 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 307 directly affects PacifiCorp (or, the “Company”), which falls under the definition of “Participating Public Utility” in Section 1(k) of the IFA. Therefore, UE 307 is an Eligible Proceeding, and an Issue Fund Grant may be made for this proceeding under Section 6.1 of the IFA.

Although Order No. 16-482 was issued in this docket on December 20, 2016, the Commission directed PacifiCorp and other parties to participate in further workshops to discuss and examine a number of issues arising in UE 307. ICNU has already participated in several of these workshops, as well as associated teleconferencing to support such workshops, with future workshops planned by the Company and other parties.

(2) Description of the areas to be investigated by ICNU:

As directed by the Commission in Order No. 16-482, ICNU has and will continue to join the Company and other parties in discussing and examining the following issues: 1) PacifiCorp's long-term fuel supply plan for the Jim Bridger coal units; 2) whether additional information and analysis should be provided relative to fuel plans for other coal-fired units; 3) Day-Ahead/Real-Time Transaction adjustments; 4) Energy Imbalance Market benefit estimation; and 5) Renewable Energy Credit valuation.

(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 \$10,960 and is seeking an Issue Fund Grant in the amount of \$8,768. ICNU will bear the costs of its participation to the extent that its costs exceed the proposed budget. However, in the event that the Commission elects to modify the scope of the workshop process directed via Order No. 16-482, 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 \$90,892.03.

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

Attached as Exhibit A is ICNU's proposed budget for the remainder of process in UE 307, as directed by the Commission in Order No. 16-482.

(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.

Basis for Request

ICNU respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$8,768, based on the following considerations:

1. In Order No. 16-482, the Commission directed PacifiCorp and other parties to discuss and examine several issues arising in UE 307.
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 the litigated portion of 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 17th day of February, 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 307

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Attorney	20	\$265	\$5,300
Paralegal	8	\$170	\$1,360
<i>Expert Witness Fees</i>			
Expert	25	\$160	\$4,000
<i>Other Expenses</i>			
Travel			\$200
Printing and Postage			\$100
Subtotal			\$10,960
20% of ICNU Funded Expenditures			\$2,192
Total ICNU Issue Fund Request			\$8,768