

# Davison Van Cleve PC

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November 2, 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: In the Matter of PORTLAND GENERAL ELECTRIC CO.  
2017 Annual Power Cost Update Tariff  
**Docket No. UE 308**

Dear Filing Center:

Enclosed 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 Portland General Electric.

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

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosures  
cc: Jay Tinker

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 308**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	REQUEST FOR FINAL PAYMENT
COMPANY	)	OF ISSUE FUND GRANT OF THE
	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
2017 Annual Power Cost Update Tariff	)	
_____	)	

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. UE 308 in the amount of \$30,224.

On May 18, 2016, ICNU filed a Request for Issue Fund Grant and Proposed Budget in Docket No. UE 308, showing eligible expenses in the amount of \$37,780 and requesting an Issue Fund Grant in the amount of \$30,224. On May 24, 2016, the Commission issued Order No. 16-201, approving an Issue Fund Grant for ICNU in the amount of \$30,224. At this time, ICNU requests that the Commission authorize final payment of the approved Issue Fund Grant in Docket No. UE 308 in the amount of \$30,224 from the 2016 PGE Issue Fund. 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,

attended the evidentiary hearing and conducted cross-examination, filed two briefs, and entered into a settlement stipulation. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU's participation in UE 308.

**Section 7.3(c)** – The Commission approved ICNU's proposed budget on May 24, 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 \$30,224 from the 2016 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 2nd day of November, 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