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November 25, 2009

Hon. Michael Grant
Oregon Public Utility Commission
P.O. Box 2148
Salem, Oregon 97308-2148

Joelle Steward
PacifiCorp
825 NE Multnomah St, Suite 800
Portland, OR 97232

RE: ICNU Request for Payment of 2009 Preauthorized Matching Grant, PacifiCorp
Account, Docket No. UM 1357

Dear Judge Grant and Ms. Steward:

The Industrial Customers of Northwest Utilities ("ICNU") files this request for payment of its 2009 Preauthorized Matching Grant from the PacifiCorp Preauthorized Matching Fund Account in the amount of \$57,500.00. This request for payment is filed pursuant to Section 7.2 of the First Amended and Restated Intervenor Funding Agreement ("IFA"), approved by the Oregon Public Utility Commission ("Commission") by Order No. 07-564 (December 19, 2007). The Commission's rules provide that the terms of a Commission-approved intervenor funding agreement will be binding on all organizations seeking a grant under the agreement and will be followed by the Commission in administering the agreement. OAR 860-012-0100(2).

ICNU meets all of the criteria for payment of a Preauthorized Matching Grant from the PacifiCorp Preauthorized Matching Fund Account, as demonstrated by the following:

1. The balance in PacifiCorp's Preauthorized Matching Fund Account for use by ICNU for 2009 is \$57,500. Under the IFA, PacifiCorp makes available an Annual Grant Amount of \$57,500, which is added to PacifiCorp's Preauthorized Matching Fund Account each calendar year during the term of the IFA. IFA at § 4.2.2. ICNU has not made a Request for Payment for a Preauthorized Matching Grant for Eligible Expenses incurred in 2009. ICNU may file a Request for Payment for a Preauthorized Matching Grant at any time during the term of the IFA, provided that a Request for Payment must be made by April 1 for expenses incurred in the previous calendar year. IFA at § 7.2. Funds from PacifiCorp's Preauthorized Matching Fund Account are available for use exclusively by ICNU. IFA at § 4.2.2.

2. A Preauthorized Matching Grant from the PacifiCorp Account must be used solely to pay Eligible Expenses for Eligible Proceedings involving PacifiCorp. IFA at § 4.2.2. ICNU requests the payment of a Preauthorized Matching Grant for Eligible Expenses incurred in the following Eligible Proceedings: UE 207, UE 210, UM 1208 and UE 199. Although ICNU has previously filed for Issue Fund Grants in UE 207 and UE 210, ICNU has spent more in these cases than it originally budgeted for in its Proposed Intervenor Funding Budget. The amounts included in this request are in excess of amounts recovered through Issue Fund Grants, including ICNU's 20% matching contribution. ICNU requests the payment of the Preauthorized Matching Grant for the expenses listed in Confidential Exhibit A, attached, which are Eligible Expenses under Section 7.4 of the IFA. Confidential Exhibit A is subject to the General Protective Order in this docket. Order No. 09-119.

3. A Preauthorized Matching Grant may be provided only if ICNU demonstrates that it has used in-house resources or outside funding for at least 50% of the Eligible Expenses for an Eligible Proceeding. IFA at § 7.2. As shown in Confidential Exhibit A, ICNU has used in-house resources and outside funding for more than 50% of the Eligible Expenses in these proceedings.

4. ICNU became precertified as eligible to receive intervenor funding grants under Section 5.2 of the IFA pursuant to Order No. 03-502, entered by the Commission on August 21, 2003.

Having demonstrated that it meets all of the criteria and conditions for such a request, ICNU requests payment of a Preauthorized Matching Grant from PacifiCorp's Preauthorized Matching Fund Account in the amount of \$57,500.00. ICNU requests that the Commission grant this request within 30 days of receipt and order PacifiCorp to pay ICNU the amount of \$57,500.00 within 30 days after receipt of the Commission directive, in accordance with Section 7.2 of the IFA. ICNU requests that the Commission treat Exhibit A as confidential.

Payment should be sent to:

Michael Early
Industrial Customers of Northwest Utilities
333 SW Taylor Street, Suite 400
Portland, OR 97204

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Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions.

Sincerely yours,

/s/ S. Bradley Van Cleve
S. Bradley Van Cleve

Enclosure
cc: Michael Early
Diane Davis