

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com
Suite 400
333 SW Taylor
Portland, OR 97204

January 22, 2013

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

Randy Dahlgren
121 S.W. Salmon St.
1WTC 1703
Portland, OR 97204

RE: ICNU Request for Payment of 2012 Preauthorized Matching Grant, PGE
Account, Docket No. UM 1357

Dear Hon. Judge Grant and Mr. Dahlgren:

The Industrial Customers of Northwest Utilities ("ICNU") files this request for final payment in the amount of \$17,215.88 for its 2012 Preauthorized Matching Grant from Portland General Electric Company's ("PGE") Preauthorized Matching Fund Account. 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 § 860-001-0120(2).

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

1. The current balance in PGE's Preauthorized Matching Fund Account for use by ICNU for 2012 is \$57,500. Under the IFA, PGE makes available an Annual Grant Amount of \$57,500, which is added to PGE'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 2012. ICNU does not intend to file another Request for Payment for a Preauthorized Matching Grant for expenses incurred in 2012. IFA at § 7.2. Funds from PGE's Preauthorized Matching Fund Account are available for use exclusively by ICNU. IFA at § 4.2.2.

2. A Preauthorized Matching Grant from the PGE Account must be used solely to pay Eligible Expenses for Eligible Proceedings involving PGE. IFA at § 4.2.2. Each of the proceedings listed in Confidential Exhibit A is an Eligible Proceeding involving PGE. ICNU requests the final payment of a Preauthorized Matching Grant for Eligible Expenses incurred in these proceedings. The amounts included in this request are in excess of the Issue Fund amounts, including ICNU's 20% matching contribution.^{1/} ICNU requests the final 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 50% of the Eligible Expenses in these Eligible Proceedings.

4. Section 4.2.2 of the IFA requires that ICNU become precertified (in accordance with Section 5.2 of the IFA) within one year of the effective date of the IFA in order to be eligible to receive a Preauthorized Matching Grant. 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 request, ICNU requests final payment of a Preauthorized Matching Grant from PGE's Preauthorized Matching Fund Account in the amount of \$17,215.88. ICNU requests that the Commission grant this request within 30 days of receipt and order PGE to pay ICNU the amount of \$17,215.88 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:

Industrial Customers of Northwest Utilities
c/o Energy Strategies
215 South State St., Suite 200
Salt Lake City, UT 84111

^{1/} In Docket Nos. UM 1568 and UM 1587, we released funds back into the PGE Issue Fund. The amounts being requested here correspond to invoicing that occurred after ICNU filed its Requests for Final Payment of PGE Issue Fund Grant.

Request for Payment of a Preauthorized Matching Grant
January 22, 2013
Page 3

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

Sincerely yours,

/s/ Melinda J. Davison

Melinda J. Davison

Enclosure
cc: ICNU