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November 18, 2011

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 REVISED Request for Payment of 2011 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 revised request for final payment in the amount of \$57,500 for its 2011 Preauthorized Matching Grant from Portland General Electric Company's ("PGE") Preauthorized Matching Fund Account. On October 12, 2011, ICNU filed its first request for final payment. On October 19, 2011, ICNU withdrew its first request for final payment to correct certain deficiencies in its original filing. This revised 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 2011 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 2011. ICNU does not intend to file another Request for Payment for a Preauthorized Matching Grant for

expenses incurred in 2011. 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. ICNU requests the final payment of a Preauthorized Matching Grant for Eligible Expenses incurred in the following proceedings:

Proceeding	Subject
UM 1514	PGE Automated Demand Response Deferral
UM 1524	PGE Independent Evaluator
UE 230	PGE Boardman Adjustment
UE 236	PGE Cost of Service Opt Out
UE 178(4) ^{1/}	PGE SB 408 Filing
UE 228(2) ^{1/}	PGE AUT

3. ICNU requests the final payment of the Preauthorized Matching Grant for the expenses listed in Confidential Exhibit A, 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.

4. 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.

5. 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 \$57,500. ICNU requests that the Commission grant this request within 30 days of receipt and order PGE to pay ICNU the amount

^{1/} ICNU received issue fund grants for UE 178(4) and UE 228(2). The Eligible Expenses listed in Confidential Exhibit A are amounts in excess of the Issue Fund Grants (including ICNU's 20% matching contribution).

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of \$57,500 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
818 SW 3rd Ave. #266
Portland, Oregon 97204

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: ICNU