

# Davison Van Cleve PC

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February 15, 2016

Hon. Michael Grant  
Chief Administrative Law Judge  
Public Utility Commission of Oregon  
201 High St. SE, Suite 100  
Salem, Oregon 97301

Jay Tinker  
Portland General Electric Co.  
121 SW Salmon St.  
1WTC0702  
Portland, OR 97204

RE: ICNU Request for Payment of 2015 Preauthorized Matching Grant, PGE  
Account, Docket No. UM 1357

Dear Hon. Judge Grant and Mr. Tinker:

The Industrial Customers of Northwest Utilities (“ICNU”) files this request for final payment in the amount of \$19,154.42 for its 2015 Preauthorized Matching Fund 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 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 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 2015 is \$132,250. Under the IFA, PGE makes available an Annual Grant Amount of \$66,125, which is added to PGE’s Preauthorized Matching Fund Account each calendar year during the term of the IFA. IFA at § 4.2. ICNU has not made a Request for Payment for a Preauthorized Matching Grant for Eligible Expenses incurred in 2015. ICNU

does not intend to file another Request for Payment for a Preauthorized Matching Grant for expenses incurred in 2015. 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. The amounts included in this request are in excess of any amounts included in requests for Issue Fund payments, including ICNU's 20% issue fund matching contribution. Accordingly, ICNU requests 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 confidential pursuant to Section 7.2 of the IFA and is subject to the General Protective Order in Docket No. UM 1357. 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 at least 50% of the Eligible Expenses for the Eligible Proceedings listed in Confidential Exhibit A.

4. Section 4.2.2 of the original IFA required that ICNU become precertified (in accordance with Section 5.2 of the original IFA) within one year of the effective date of the original 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 original 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 the Preauthorized Matching Grant from PGE's Preauthorized Matching Fund Account in the amount of \$19,154.42. ICNU requests that the Commission grant this request within 30 days of receipt and order PGE to pay ICNU the amount of \$19,154.42 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 S. Bradley Van Cleve  
Davison Van Cleve, P.C.  
333 SW Taylor, Suite 400  
Portland, OR 97204

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February 15, 2016  
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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: ICNU