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October 12, 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 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 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. 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 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. 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. Although ICNU previously filed for Issue Fund Grants in UE 228 and UE 178(4), ICNU has spent more in those cases than it originally budgeted for in its Proposed Intervenor Funding Budgets. The amounts included in this request are in excess of the Issue Fund amounts, including ICNU's 20% matching contribution. 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 \$57,500. ICNU requests that the Commission grant this request within 30 days of receipt and order PGE to pay ICNU the amount 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
333 SW Taylor Ave, Suite 400
Portland, Oregon 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: ICNU