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October 18, 2013

Via Electronic Mail and Federal Express

Public Utility Commission of Oregon
Attn: Filing Center
3930 Fairview Industrial Drive SE
Salem OR 97302

Re: In the Matter of The Public Utility Commission of Oregon
Investigation into Treatment of Pension Costs in Utility Rates
Docket No. UM 1633

Dear Filing Center:

Enclosed please find the original and one (1) copy of the Request for Partial Payment of Issue Fund Grant and Confidential Exhibit A on behalf of the Industrial Customers of Northwest Utilities. Pursuant to Section 7.3 of the Intervenor Funding Agreement, Confidential Exhibit A is being submitted in a separate sealed envelope to the Commission and to PacifiCorp and Portland General Electric Company.

Thank you for your assistance, and please do not hesitate to contact our office if you have any questions.

Sincerely,

/s/ Jesse Gorsuch
Jesse Gorsuch

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the Request for Partial Payment of Issue Fund Grant on behalf of the Industrial Customers of Northwest Utilities upon all parties in this proceeding by causing a copy thereof to be sent via electronic mail to each party's last-known e-mail address, as shown below.

Dated at Portland, Oregon, this 18th day of October, 2013.

/s/ Jesse Gorsuch
Jesse Gorsuch

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1633

In the Matter of)	
)	
THE PUBLIC UTILITY COMMISSION OF)	REQUEST FOR PARTIAL PAYMENT
OREGON)	OF ISSUE FUND GRANT OF THE
)	INDUSTRIAL CUSTOMERS OF
Investigation into Treatment of Pension Costs)	NORTHWEST UTILITIES
in Utility Rates)	
_____)	

Pursuant to Section 7.3 of the Second Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) by Order No. 12-452 (November 7, 2012), the Industrial Customers of Northwest Utilities (“ICNU”) hereby requests partial payment of ICNU’s Issue Fund Grant in Docket No. UM 1633 in the amount of \$13,991.54. Since the Issue Fund Grant is being split between the PacifiCorp and Portland General Electric (“PGE”) Issue Funds, ICNU requests payment of \$6,995.77 from PacifiCorp’s Issue Fund and \$6,995.77 from PGE’s Issue Fund. Following payment of these amounts, the amounts remaining in the Issue Funds for this Docket will be \$3,004.23 for the PacifiCorp Issue Fund and \$3,004.23 for the PGE Issue Fund.

On April 15, 2013, ICNU filed a Proposed Budget for an Issue Fund Grant in Docket No. UM 1633 in the amount of \$20,000. On April 22, 2013, the Commission issued Order No. 13-144 approving an Issue Fund Grant for ICNU in the amount of \$20,000, with \$10,000 coming from the PacifiCorp Issue Fund and \$10,000 coming from the PGE Issue Fund. At this time, ICNU requests partial payment of the approved Issue Fund Grant in Docket No. UM 1633.

ICNU hereby requests that the Commission authorize partial payment of the Issue Fund Grant in the amount of \$13,991.54. ICNU's expenses are shown in Confidential Attachment A.

This Request for Payment satisfies the requirements of the IFA as follows:

Section 7.3(a) – The itemized expenses, payees, and hourly rates are attached as Confidential Exhibit A.

Section 7.3(b) – ICNU has been an active participant in this Docket. ICNU has conducted discovery, attended workshops, analyzed pension issues, and filed a brief. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU's participation in UM 1633.

Section 7.3(c) – The Commission approved ICNU's proposed budget on April 22, 2013. In addition, ICNU used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA.

Section 7.3(d) - This Request for Payment constitutes a Partial Request for Payment in this Docket.

Section 7.4 – All of the expenses included in Exhibit A are Eligible Expenses as defined in Section 7.4 of the IFA because they relate to services provided or expenses incurred by ICNU's outside legal counsel and expert witnesses. Relevant non-privileged documents substantiating the Eligible Expenses in Confidential Exhibit A are available for Commission audit, if requested, pursuant to Section 7.10 of the IFA.

The IFA provides that the granting of “an Issue Fund Grant shall constitute a binding obligation on the Commission to order reimbursement of Eligible Expenses.” IFA § 6.5. Likewise, the intervenor funding rules adopted by the Commission provide that “[t]he terms of an [intervenor funding] agreement are binding on all organizations seeking a grant under that agreement and will be followed by the Commission in administering the agreement.” OAR § 860-001-0120(2). ICNU has satisfied the terms of the IFA and respectfully requests that the Commission approve partial payment of ICNU's Issue Fund Grant in the amount of

\$6,995.77 from the PGE Issue Fund and \$6,995.77 from the PacifiCorp Issue Fund within 30 days of receiving this Request for Partial Payment as provided in Section 7.6 of the IFA.

Payment should be sent to:

Industrial Customers of Northwest Utilities
818 SW 3rd Ave, Suite 266
Portland, Oregon 97204

Dated this 18th day of October, 2013.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

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