

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1662

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PROPOSED BUDGET FOR
COMPANY and PACIFICORP d/b/a PACIFIC)	ISSUE FUND GRANT OF THE
POWER)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
)	
Request for Generic Power Cost Adjustment)	
Mechanism Investigation.)	
_____)	

Pursuant to Section 6.3 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”) files this Proposed Budget in Docket No. UM 1662 (the “Proceeding”), for an Issue Fund Grant in the amount of \$35,000. ICNU will bear all of its costs in this proceeding that exceed ICNU’s Proposed Budget. ICNU proposes that this grant be funded with \$17,500 from the 2015 PacifiCorp Issue Fund Account and \$17,500 from the 2015 Portland General Electric Company (“PGE”) Issue Fund Account. ICNU respectfully requests that the Commission act on this Proposed Budget within fourteen days of receipt, as provided in Section 6.4 of the IFA. The following information is provided in accordance with Section 6.3 of the IFA:

(1) Statement of the work to be performed by ICNU for which ICNU is seeking the Issue Fund Grant:

ICNU has retained Davison Van Cleve, P.C. to represent ICNU in UM 1662. The IFA defines an Eligible Proceeding as “any Commission proceeding that directly affects one or

more of the Participating Public Utilities . . .” IFA, Section 1(c). UM 1662 directly affects PacifiCorp and PGE, both of which meet the definition of a “Participating Public Utility” in Section 1(k) of the IFA. Accordingly, UM 1662 is an Eligible Proceeding, and an Issue Fund Grant may be made for this proceeding under Section 6.1 of the IFA.

ICNU will attend all workshops, settlement meetings, oral presentations and hearings in UM 1662. ICNU plans to conduct discovery in this proceeding. In addition, ICNU will submit expert witness testimony and briefs as called for by any procedural schedule in this Docket.

(2) Description of the areas to be investigated by ICNU:

ICNU intends to investigate numerous aspects of PacifiCorp and PGE’s request for a generic power cost adjustment mechanism (“PCAM”), including:

- a) Whether there is a need to change the current PCAM mechanisms;
- b) Whether there should be a uniform PCAM mechanism applicable to both utilities;
- c) How renewable resources should be treated in PCAM mechanisms; and
- d) Issues raised by the parties to the proceeding.

(3) Description of the particular customer class or classes that will benefit from the intervenor’s participation:

ICNU’s participation will directly benefit industrial customers, as well as all other large non-residential customers of PacifiCorp and PGE.

(4) Identification of the specific Fund Account from which ICNU is seeking the Issue Fund Grant and Available Funds:

ICNU proposes a total budget of \$43,750, and is seeking an Issue Fund Grant in the amount of \$35,000, to be split evenly between the PGE and PacifiCorp 2015 Issue Fund Accounts. ICNU will bear the costs of its participation to the extent that its costs exceed the proposed budget. However, in the event the Commission elects to modify the scope of this proceeding, ICNU reserves the right to file a request to amend its budget.

ICNU estimates that the amounts currently available in the PacifiCorp and PGE Issue Fund Accounts for 2015 are \$158,695.52 and \$144,104.81, respectively.

(5) Budget showing estimated attorney and consultant fees and expert witness fees:

Attached as Exhibit A is ICNU's proposed budget in UM 1662.

(6) Matching Funds

As required by Section 6.3(f) of the IFA, ICNU represents that it will use matching fund resources in the form of either in-house resources or outside funding to account for or pay at least 20% of the Eligible Expenses for which ICNU is seeking an Issue Fund Grant. As such, ICNU seeks an Issue Fund Grant for 80% of its proposed budget in this proceeding. ICNU's proposed budget assumes a fully litigated case. If the case is settled prior to hearing, actual expenses could be lower.

Basis for Request

ICNU respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$35,000 based on the following considerations:

1. In this proceeding, PacifiCorp and PGE have requested a generic investigation into the design and policies of the PCAMs in place for the two companies. Modification of the PCAM of either utility could have a material impact on customers.

2. ICNU represents the interests of industrial customers and has significant experience participating in Commission proceedings involving the power costs and PCAMs of PacifiCorp and PGE. Thus, ICNU possesses significant interest and expertise with respect to the subject matter in this proceeding. ICNU's participation will benefit all of PacifiCorp's and PGE's industrial and large non-residential customers.

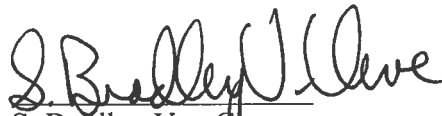
3. ICNU has been precertified under Sections 5.1 and 5.2 of the IFA and OAR § 860-001-0120(3)(b), as eligible to receive an Issue Fund Grant, by Commission Order No. 03-502, which was entered on August 21, 2003.

Therefore, ICNU respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount specified above.

Dated this 15th day of January, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



S. Bradley Van Cleve
333 S.W. Taylor, Suite 400
Portland, Oregon 97204
(503) 241-7242 phone
(503) 241-8160 facsimile
bvc@dvclaw.com
Of Attorneys for Industrial Customers
of Northwest Utilities

UM 1662

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	40	\$275	\$11,000
Associate Attorney	63	\$205	\$12,915
Paralegal	10	\$150	\$1,500
<i>Expert Witness Fees</i>			
Expert 1	132	\$136	\$17,952
<i>Other Expenses</i>			
Travel			
Printing and Postage			\$383
Subtotal			\$43,750
20% of ICNU Funded Expenditures			\$8,750
Total ICNU PacifiCorp Issue Fund Grant Proposed Budget			\$17,500
Total ICNU PGE Issue Fund Grant Proposed Budget			\$17,500
Total ICNU Issue Fund Request			\$35,000