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Suite 400
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December 10, 2014

Via E-mail and Federal Express

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

Re: PACIFICORP dba PACIFIC POWER
Application for Approval of Deferred Accounting and Prudence Determination
Associated with the Energy Imbalance Market
Docket No. UM 1689

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of the Request for Final 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 PacifiCorp.

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

Sincerely,



Jesse O. Gorsuch

Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the attached **Request for Final Payment of Issue Fund Grant** upon all parties in this proceeding by sending a copy via electronic mail to the following parties at the following addresses.

Dated at Portland, Oregon, this 10th day of December, 2014.



Jesse O. Gorsuch

(W) CITIZENS' UTILITY BOARD OF OREGON

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1689

In the Matter of)	
)	
PACIFICORP d/b/a PACIFIC POWER)	REQUEST FOR FINAL
)	PAYMENT OF ISSUE FUND
Application for Approval of Deferred)	GRANT OF THE INDUSTRIAL
Accounting and Prudence Determination)	CUSTOMERS OF NORTHWEST
Associated with the Energy Imbalance Market)	UTILITIES
)	

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 final payment of ICNU’s Issue Fund Grant in Docket No. UM 1689 in the amount of \$541.28.

On May 28, 2014, ICNU filed a Proposed Budget for an Issue Fund Grant in Docket No. UM 1689 in the amount of \$29,000. On the same date, the Commission issued Order No. 14-186 approving an Issue Fund Grant for ICNU in the amount of \$29,000. On August 29, 2014, ICNU requested partial payment of its approved Issue Fund Grant in the amount of \$14,712.90. At this time, ICNU requests final payment of the approved Issue Fund Grant in Docket No. UM 1689. As described below, ICNU requests that the unused portion of the Issue Fund Grant be reallocated to Docket No. UM 1633.

ICNU hereby requests that the Commission authorize final payment of the Issue Fund Grant in the amount of \$541.28. 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, participated in settlement conferences, filed testimony and entered into a stipulation. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU’s participation in UM 1689.

Section 7.3(c) – The Commission approved ICNU’s proposed budget on May 28, 2014. 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 Final 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 final payment of ICNU’s Issue Fund Grant in the amount of \$541.28 from the 2014 PacifiCorp Issue Fund within 30 days of receiving this Request for Final Payment as provided in Section 7.6 of the IFA.

Pursuant to Section 6.7 of the IFA, ICNU requests that the Commission reallocate the remaining \$13,745.82 of the Issue Fund Grant in this proceeding to Docket No. UM 1633.

The scope of UM 1633 has grown considerably since ICNU submitted its original and amended budgets in that Docket, and the duration of the case has exceeded initial expectations. As a result, ICNU has had to invest additional time and resources that were not foreseen.

Accordingly, ICNU respectfully requests that the remaining \$13,745.82 in the UM 1689 Issue Fund Grant be reallocated to UM 1633 for use in that proceeding. Upon payment of this Request for Final Payment and reallocation of the remaining funds to UM 1633, the balance of the UM 1689 Issue Fund Grant will be zero, and the balance of the UM 1633 Issue Fund Grant will be \$24,717.28 ^{1/}.

Payment should be sent to:

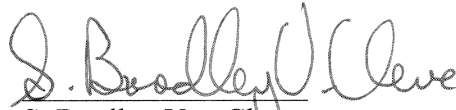
Industrial Customers of Northwest Utilities
c/o S. Bradley Van Cleve
Davison Van Cleve, P.C.
333 SW Taylor, Suite 400
Portland, OR 97204

^{1/} This amount assumes that the Commission also approves ICNU's request to reallocate unused issue funds in Docket No. UE 287.

Dated this 10th day of December, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

A handwritten signature in cursive script that reads "S. Bradley Van Cleve". The signature is written in dark ink and is positioned above the typed name.

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Of Attorneys for Industrial Customers
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