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August 15, 2016

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY
2016 Revised Renewable Portfolio Implementation Plan
Docket No. UM 1788

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the Request for Issue Fund Grant and Proposed Budget on behalf of the Industrial Customers of Northwest Utilities.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

more of the Participating Public Utilities. . . .” IFA, Section 1(c). UM 1788 directly affects PGE, which falls under the definition of “Participating Public Utility” in Section 1(k) of the IFA. Therefore, UM 1788 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 clarifying sessions, workshops, conferences, public meetings, and oral presentations in UM 1788, and will conduct discovery as necessary. ICNU will retain an expert witness to review the filing and assist in submitting any comments. In addition, PacifiCorp currently has a revised 2017-2021 RPS Implementation Plan pending in UM 1790, and any ICNU work that could address both filings will be equally split between the cases.

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

ICNU intends to investigate PGE’s plan to meet its RPS requirements in the years 2017-2021 with bundled renewable energy certificates (“RECs”) from existing Oregon-eligible resources, as well as other issues related to the filing.

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

ICNU’s participation will directly benefit industrial customers who take service from PGE, as well as other PGE customers.

(4) Identification of the specific Fund account from which ICNU is seeking the Issue Fund Grant:

ICNU is seeking an Issue Fund Grant in the amount of \$5,000 from the unused portion of its approved Issue Fund Grant in Docket No. UM 1623, and is not requesting additional funds from the 2016 PGE Issue Fund Account.

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

Attached as Exhibit A is ICNU's Proposed Budget. The Proposed Budget details the expected hours and hourly rates of ICNU's attorney and expert. The Proposed Budget was developed based on the costs ICNU incurred in previous cases.

(6) Matching Funds

As required by Section 6.3(f) of the IFA, ICNU represents that it will use matching funds 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. ICNU's proposed budget assumes that the case will end with a final order from the Commission. Actual expenses could be lower depending upon any early agreement by the parties; if the scope of the case is expanded, ICNU reserves the right to submit a revised budget.

Basis for Request

ICNU respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$5,000, based on the following considerations:

1. The incremental costs of compliance with renewable standards could rise significantly, and all incremental costs are included in PGE's rates paid by ICNU members who are customers of PGE.
2. ICNU will audit and review PGE's RPS Implementation Plan filing for compliance with relevant statutory and Commission rule requirements.
3. ICNU represents the interests of industrial customers and has significant experience participating in Commission proceedings involving PGE. ICNU's participation will benefit PGE industrial customers, as well as other customers of PGE.

4. Pursuant to Commission Order No. 03-502, entered on August 21, 2003, 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.

Therefore, ICNU respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount of \$5,000. ICNU prepared the attached budget on the basis of costs incurred in previous cases.

Dated this 15th day of August, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

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Of Attorneys for Industrial Customers
of Northwest Utilities

Exhibit A

Proposed Budget of ICNU

UM 1788

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Attorney	8	\$265	\$2,120
Paralegal	10	\$170	\$1,700
<i>Expert Witness Fees</i>			
Expert 1	15	\$160	\$2,400
<i>Other Expenses</i>			
Printing and Postage			\$30
Subtotal			\$6,250
20% of ICNU Funded Expenditures			\$1,250
Total ICNU Issue Fund Request			\$5,000