

# Davison Van Cleve PC

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com

Suite 400  
333 SW Taylor  
Portland, OR 97204

November 14, 2014

*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 PACIFICORP  
Multi-State Intervenor Funding Agreement  
**Docket No. UM 1586**

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 PacifiCorp.

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

Sincerely,



Jesse O. Gorsuch

Enclosures

cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served this **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 to be sent via electronic mail to the following parties at the following addresses.

Dated in Portland, Oregon, this 14th day of November, 2014.



Jesse O. Gorsuch

**(W) CITIZENS' UTILITY BOARD OF OREGON**

ROBERT JENKS  
G. CATRIONA MCCRACKEN  
610 SW BROADWAY, STE 400  
PORTLAND OR 97205  
bob@oregoncub.org  
catriona@oregon.org

**(W) PACIFIC POWER**

SARAH WALLACE  
SENIOR COUNSEL  
825 NE MULTNOMAH ST. STE 2000  
PORTLAND, OR 97232  
sarah.wallace@pacificcorp.com

**(W) PACIFICORP**

R. BRYCE DALLEY  
VICE PRESIDENT, REGULATION  
825 NE MULTNOMAH STE 2000  
PORTLAND OR 97232  
bryce.dalley@pacificcorp.com

**(W) PACIFICORP, dba**

**PACIFIC POWER**  
OREGON DOCKETS  
825 NE MULTNOMAH ST. STE 2000  
PORTLAND, OR 97232  
oregondockets@pacificcorp.com

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1586**

In the Matter of	)	
	)	
PACIFICORP	)	<b>REQUEST FOR PARTIAL PAYMENT</b>
	)	<b>OF ISSUE FUND GRANT OF THE</b>
Multi-State Process Intervenor Funding	)	<b>INDUSTRIAL CUSTOMERS OF</b>
Agreement.	)	<b>NORTHWEST UTILITIES</b>
_____	)	

Pursuant to Section 6.1 of the Multi-State Process (“MSP”) Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) by Order Nos. 12-110 and 12-122, the Industrial Customers of Northwest Utilities (“ICNU”) hereby requests partial payment of ICNU’s MSP Issue Fund Grant in Docket No. UM 1586 in the amount of \$17,604.53.

On December 31, 2013, ICNU filed a Proposed Budget for an Issue Fund Grant in Docket No. UM 1586 in the amount of \$40,000. On January 9, 2014, the Commission approved an Issue Fund Grant for ICNU in the amount of \$40,000 in Order No. 14-007. At this time, ICNU requests partial payment of the approved MSP Issue Fund Grant in Docket No. UM 1586.

ICNU hereby requests that the Commission authorize partial payment of its MSP Issue Fund Grant in the amount of \$17,604.53. ICNU’s expenses are shown in Confidential Exhibit A.

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

**Section 6.1(a)** – The itemized expenses, payees, and hourly rates are attached as Confidential Exhibit A.

**Section 6.1(b)** – ICNU has been an active participant in this Docket. ICNU has participated in all meetings and conducted technical analysis of the appropriate interstate cost allocation methodology for PacifiCorp. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU’s participation in UM 1586.

**Section 6.1(c)** – The Commission approved ICNU’s proposed budget on January 9, 2014. In addition, ICNU used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.1 of the MSP IFA.

**Section 6.2** – All of the expenses included in Exhibit A are Eligible Expenses as defined in Section 6.2 of the MSP 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 6.8 of the MSP IFA.

The MSP IFA provides that “the Commission will authorize reimbursement of Eligible Expenses upon satisfaction of any conditions imposed on the MSP Fund Grant and the requirements set forth in Article 6 and Article 7 [of the MSP IFA].” MSP IFA § 5.3. 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 MSP IFA and respectfully requests that the Commission approve partial payment of ICNU’s Issue Fund Grant in the amount of \$17,604.53 within 30 days of receiving this Request for Partial Payment as provided in Section 6.4 of the MSP IFA.

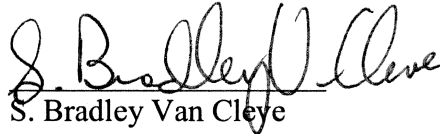
Payment should be sent to:

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

Dated this 14th day of November, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

A handwritten signature in black ink, appearing to read "S. Bradley Van Cleve". The signature is written in a cursive style with a horizontal line underneath the name.

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