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August 15, 2016

***Via Electronic Filing and Federal Express***

Public Utility Commission of Oregon  
Attn: Filing Center  
3930 Fairview Industrial Dr. SE  
P.O. Box 1088  
Salem OR 97308-1088

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,  
Application for Deferral Accounting of Excess Pension Costs and  
Carrying Costs on Cash Contributions  
**Docket No. UM 1623**

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the Request for Final Payment and Reallocation 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 PGE.

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

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1623**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	REQUEST FOR FINAL PAYMENT
COMPANY,	)	AND REALLOCATION OF ISSUE
	)	FUND GRANT OF THE INDUSTRIAL
Application for Deferral Accounting of	)	CUSTOMERS OF NORTHWEST
Excess Pension Costs and Carrying Costs on	)	UTILITIES
Cash Contributions.	)	
_____	)	

Pursuant to Section 7.3 of the Third Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) by Order No. 15-335 (October 20, 2015), the Industrial Customers of Northwest Utilities (“ICNU”) hereby requests final payment of ICNU’s Issue Fund Grant in Docket No. UM 1623 in the amount of \$18,587.47.

On February 12, 2016, ICNU filed its Proposed Budget for Issue Fund Grant in this Docket showing eligible expenses in the amount of \$37,500 and requesting an Issue Fund Grant in the amount of \$30,000. On February 19, 2016, the Commission issued Order No. 16-060, approving an Issue Fund Grant for ICNU in the amount of \$30,000. At this time, ICNU requests final payment of its approved Issue Fund Grant in Docket No. UM 1623 in the amount of \$18,587.47. As described below, ICNU requests that the unused portion of the UM 1623 Issue Fund Grant be reallocated to Docket Nos. UE 308 and UM 1788 in the amounts specified for use in those proceedings.

ICNU hereby requests that the Commission authorize final payment of the Issue Fund Grant in the amount of \$18,587.47 from the 2016 PGE Issue Fund. 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 deferral issues, and filed briefs and testimony. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU's participation in UM 1623.

**Section 7.3(c)** – The Commission approved ICNU's initial proposed budget on February 19, 2016. 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 \$18,587.47

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from the 2016 PGE 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 respectfully requests that the Commission reallocate the remaining \$11,412.53 of the Issue Fund Grant in this proceeding to Docket Nos. UE 308 and UM 1788, with \$6,412.53 going to UE 308 and \$5,000 going to UM 1788. ICNU expects that its participation in UE 308 will require additional time and resources that were not foreseen, and which were not outlined in its original proposed budget in that docket. ICNU also anticipates it will invest significant time and resources in Docket No. UM 1788.

Also pursuant to Section 6.7 of the IFA, ICNU is concurrently filing an amendment to its proposed budget in Docket No. UE 308, as well as a proposed budget in Docket No. UM 1788. Upon payment of this Request for Final Payment and reallocation of funds to UE 308 and UM 1788, the balance of the UM 1623 Issue Fund Grant will be zero, the balance of ICNU's Amended Proposed Budget in UE 308 will be \$38,061.03<sup>1/</sup>, and the balance of ICNU's Proposed Budget in UM 1788 will be \$5,000.

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

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<sup>1/</sup> This amount assumes that the Commission also grants ICNU's request to reallocate unused issue funds in Docket No. UM 1755.

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  
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