

# Davison Van Cleve PC

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March 28, 2014

*Via E-Mail and Federal Express*

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

Re: PORTLAND GENERAL ELECTRIC and  
PACIFICORP d/b/a PACIFIC POWER  
Request for a Generic Power Cost Adjustment Mechanism Investigation  
**Docket No. UM 1662**

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of the Notice of Intent to Request Issue Fund Grant of the Industrial Customers of Northwest Utilities.

Thank you for your assistance, and please do not hesitate to call our office with any questions.

Sincerely,



Jesse O. Gorsuch

Enclosures

cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the attached **Notice of Intent to Request an Issue Fund Grant of the Industrial Customers of Northwest Utilities** 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 28th day of March, 2014.



Jesse O. Gorsuch

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

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**(W) PUC STAFF – DEPARTMENT OF JUSTICE**

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**(W) PORTLAND GENERAL ELECTRIC**

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**(W) PUBLIC UTILITY COMMISSION OF OREGON**

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**(W) PACIFICORP**

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stefan.bird@pacificorp.com

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1662**

|   |   |                                |
|---|---|--------------------------------|
| In the Matter of                          | ) |                                |
|   | ) |                                |
| PORTLAND GENERAL ELECTRIC                 | ) | NOTICE OF INTENT TO REQUEST AN |
| COMPANY and PACIFICORP d/b/a              | ) | ISSUE FUND GRANT OF THE        |
| PACIFIC POWER                             | ) | INDUSTRIAL CUSTOMERS OF        |
|   | ) | NORTHWEST UTILITIES            |
| Request for Generic Power Cost Adjustment | ) |                                |
| Mechanism Investigation.                  | ) |                                |
| _____                                     | ) |                                |

The Industrial Customers of Northwest Utilities (“ICNU”) files this Notice of Intent to Request an Issue Fund Grant in Docket No. UM 1662, pursuant to OAR § 860-001-0120 and the Second Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 12-452 (November 7, 2012).

1. On June 19, 2013, Portland General Electric (“PGE”) and PacifiCorp d/b/a Pacific Power (“PacifiCorp”) (collectively, the “Companies”) filed with the Commission a request for a generic investigation into the power cost adjustment mechanisms (“PCAMs”) now in place for the Companies. The Commission docketed the filing as Docket No. UM 1662. On March 21, 2014, following discussions with Commission Staff, the Citizens’ Utility Board and ICNU, the Companies filed a narrower request for an investigation into the recovery of all costs incurred by the Companies to comply with Oregon’s Renewable Portfolio Standard.

2. ICNU opposes opening an investigation into the Companies’ PCAMs. If the Commission opens an investigation, ICNU will seek intervenor funding. Prior to adopting a

schedule, ICNU requests that the parties be allowed to address whether this investigation is warranted.

3. UM 1662 is an Eligible Proceeding under the IFA. 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 will directly affect PGE and PacifiCorp, which are Participating Public Utilities under Section 1(k) of the IFA. Therefore, an Issue Fund Grant may be made for this proceeding under Section 6.1 the IFA.

4. As required by Section 6.2 of the IFA, this Notice of Intent is being filed at the time ICNU is requesting intervention in UM 1662.

5. As required by Section 6.2 of the IFA, this Notice of Intent is being served on each affected Participating Public Utility, all precertified organizations, and all parties identified on the service list from UM 1662.

6. ICNU identifies the PGE and PacifiCorp Issue Fund Accounts as the accounts from which ICNU intends to request the Issue Fund Grant.

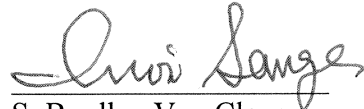
7. ICNU has been precertified under Sections 5.1 and 5.2 of the IFA and OAR § 860-001-0120(3)(b), as eligible to receive an Issue Fund Grant, by Commission Order No. 03-502, which was entered on August 21, 2003.

8. ICNU requests that the Commission establish a deadline by which ICNU must file a proposed budget with respect to the Issue Fund Grant, as provided in Section 6.3 of the IFA.

Dated this 28th day of March, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

A handwritten signature in cursive script that reads "Irion A. Sanger". The signature is written in black ink and is positioned above a horizontal line.

S. Bradley Van Cleve

Irion A. Sanger

Davison Van Cleve, P.C.

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Of Attorneys for the Industrial Customers  
of Northwest Utilities