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February 12, 2016

Via Electronic Filing and Federal Express

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

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

Dear Filing Center:

Enclosed for filing in the above-captioned proceeding, please find 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, PacifiCorp and Portland General Electric Co.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1662

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	REQUEST FOR FINAL PAYMENT OF
COMPANY and PACIFICORP d/b/a PACIFIC)	ISSUE FUND GRANT OF THE
POWER)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
)	
Request for Generic Power Cost Adjustment)	
Mechanism Investigation.)	
<hr/>)	

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 1662 in the amount of \$15,103.50. Since the Issue Fund Grant is being split between the PacifiCorp and Portland General Electric (“PGE”) Issue Funds, ICNU requests payment of \$7,551.75 from PacifiCorp’s Issue Fund and \$7,551.75 from PGE’s Issue Fund. As described below, ICNU requests that the unused portion of the Issue Fund Grant in this Docket be released back into the PacifiCorp and PGE Issue Funds in the amounts specified.

On January 15, 2015, ICNU filed a Proposed Budget for an Issue Fund Grant in Docket No. UM 1662 in the amount of \$35,000. On January 26, 2015, the Commission issued Order No. 15-013, approving an Issue Fund Grant for ICNU in the amount of \$35,000, with \$17,500 to be drawn from the PacifiCorp Issue Fund and \$17,500 from the PGE Issue Fund. On October 5, 2015, ICNU requested partial payment of its approved Issue Fund Grant in the

amount of \$9,491.02 from the PacifiCorp Issue Fund and \$9,491.01 from the PGE Issue Fund, for a total partial request of \$18,982.03.

ICNU now requests final payment of the approved Issue Fund Grant in Docket No. UM 1662 in the amount of \$15,103.50. Of this amount, ICNU requests that \$7,551.75 be drawn from the PacifiCorp Issue Fund and \$7,551.75 from the PGE Issue Fund. Following payment of these amounts, ICNU requests that the remaining \$914.47 of the approved Issue Fund Grant in UM 1662 be released back into the PacifiCorp and PGE Issue Fund Accounts, with \$457.23 released to the PacifiCorp Issue Fund and \$457.24 released to the PGE Issue Fund.

ICNU hereby requests that the Commission authorize final payment of the Issue Fund Grant in the amount of \$15,103.50. 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 a settlement conference, submitted testimony, and filed a brief. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU's participation in UM 1662.

Section 7.3(c) – The Commission approved ICNU's proposed budget on January 26, 2015. 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 \$7,551.75 from the PacifiCorp Issue Fund and \$7,551.75 from the PGE Issue Fund within 30 days of receiving this Request for Final Payment as provided in Section 7.6 of the 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 12th day of February, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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