

# Davison Van Cleve PC

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October 5, 2015

## *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 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, PacifiCorp, and Portland General Electric.

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

Pursuant to Section 7.3 of the Second Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) by Order No. 12-452 (November 7, 2012), the Industrial Customers of Northwest Utilities (“ICNU”) hereby requests partial payment of ICNU’s Issue Fund Grant in Docket No. UM 1662 in the amount of \$18,982.03. Since the Issue Fund Grant is being split between the PacifiCorp and Portland General Electric (“PGE”) Issue Funds, ICNU requests payment of \$9,491.02 from PacifiCorp’s Issue Fund and \$9,491.01 from PGE’s Issue Fund. Following payment of these amounts, the amounts remaining in the Issue Funds for this Docket will be \$8,008.98 for the PacifiCorp Issue Fund and \$8,008.99 for the PGE Issue Fund.

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. At this time, ICNU requests partial payment of the approved Issue Fund Grant in Docket No. UM 1662.

ICNU hereby requests that the Commission authorize partial payment of the Issue Fund Grant in the amount of \$18,982.03. 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 Partial 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 partial payment of ICNU's Issue Fund Grant in the amount of

\$9,491.02 from the PacifiCorp Issue Fund and \$9,491.01 from the PGE Issue Fund within 30 days of receiving this Request for Partial 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 5th day of October, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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