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April 15, 2015

## *Via Electronic Filing*

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

Re: PUBLIC UTILITY COMMISSION OF OREGON  
Investigation into Large Customer Energy Efficiency Limitations  
**Docket No. UM 1713**

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the Proposed Budget for Issue Fund Grant of the Industrial Customers of Northwest Utilities.

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

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1713**

In the Matter of	)	
	)	
PUBLIC UTILITY COMMISSION OF	)	PROPOSED BUDGET FOR
OREGON	)	ISSUE FUND GRANT OF THE
	)	INDUSTRIAL CUSTOMERS OF
Investigation into Large Customer Energy	)	NORTHWEST UTILITIES
Efficiency Limitations	)	
_____	)	

Pursuant to Section 6.3 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”) files this Proposed Budget in Docket No. UM 1713 (the “Proceeding”) for an Issue Fund Grant in the amount of \$15,000. ICNU proposes that \$4,000 come from the 2015 Portland General Electric (“PGE”) Issue Fund and \$11,000 come from the PacifiCorp 2015 Issue Fund. ICNU respectfully requests that the Commission act on this Proposed Budget within fourteen days of receipt, as provided in Section 6.4 of the IFA. The following information is provided in accordance with Section 6.3 of the IFA:

**(1) Statement of the work to be performed by ICNU for which ICNU is seeking the Issue Fund Grant:**

ICNU has retained Davison Van Cleve, P.C. to represent ICNU in UM 1713. 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 1713 directly affects PGE and PacifiCorp, both of which fall under the definition of “Participating Public Utility” in

Section 1(k) of the IFA. Therefore, UM 1713 is an Eligible Proceeding, and an Issue Fund Grant may be made for this proceeding under Section 6.1 of the IFA.

ICNU will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in UM 1713, and plans to conduct discovery in this proceeding. In addition, ICNU will submit comments, expert witness testimony and briefs as called for by the procedural schedule in this Docket.

**(2) Description of the areas to be investigated by ICNU:**

ICNU intends to examine several aspects of the Commission's investigation in this Docket, including:

Are customers with loads greater than 1 aMW receiving a direct benefit from conservation measures funded by amounts collected pursuant to SB 838?

What is the meaning of "any direct benefit" as used in ORS 757.689(2)(b)?

Are there any barriers that prevent the Energy Trust of Oregon ("ETO") from obtaining all cost-effective energy efficiency?

If such barriers exist, what other options exist to gain all cost effective energy efficiency, including from customers with loads greater than 1 aMW?

Should the ETO approach to funding energy efficiency be flexible to take advantage of energy efficiency savings brought about by changes in technology and the economy?

Should there continue to be a cap on energy efficiency funding provided by the ETO to PGE and PacifiCorp customers with loads greater than 1 aMW, and if so, what criteria should be used to set such a cap?

**(3) Description of the particular customer class or classes that will benefit from the intervenor's participation:**

ICNU's participation will directly benefit industrial customers, as well as all other large non-residential customers of PGE and PacifiCorp.

**(4) Identification of the specific Fund account from which ICNU is seeking the Issue Fund Grant and Available Funds:**

ICNU proposes a total budget of \$35,200, and is seeking an Issue Fund Grant in the amount of \$15,000 (\$4,000 from the 2015 PGE Issue Fund and \$11,000 from the 2015 PacifiCorp Issue Fund). ICNU is limiting its Issue Fund request due to the limited funds available in both the 2015 PGE Issue Fund and the 2015 PacifiCorp Issue Fund. In the event additional funds become available in these accounts, ICNU reserves the right to amend its request. ICNU estimates that the amount currently available in the PGE Issue Fund Account for 2015 is \$4,082.81, and estimates the amount currently available in the PacifiCorp Issue Fund Account for 2015 is \$66,435.52.

**(5) Budget showing estimated attorney and consultant fees and expert witness fees:**

Attached as Exhibit A is ICNU's proposed budget in UM 1713.

**(6) Matching Funds**

As required by Section 6.3(f) of the IFA, ICNU represents that it will use matching fund resources in the form of either in-house resources or outside funding to account for or pay at least 20% of the Eligible Expenses for which ICNU is seeking an Issue Fund Grant. ICNU's proposed budget assumes a fully litigated case. If the case is settled prior to hearing, actual expenses could be lower.

**Basis for Request**

ICNU respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$15,000 based on the following considerations:

1. The Commission's investigation will address whether customers with loads greater than one average megawatt are receiving a direct benefit from conservation

measures funded by amounts collected under SB 838. The investigation will also examine whether barriers exist that may prevent ETO from obtaining all cost-effective energy efficiency from large customers. Accordingly, ICNU's members stand to be directly and substantially impacted by the outcome of this investigation. In addition, the case raises important questions of policy and fact.

2. ICNU represents the interests of industrial customers and has significant experience participating in Commission proceedings involving the Commission, PGE and PacifiCorp. As such, ICNU possesses significant interest and expertise with respect to this proceeding. ICNU's participation will benefit all PGE and PacifiCorp industrial and large non-residential customers.

3. 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.

Therefore, ICNU respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount specified above.

Dated this 15th day of April, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

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Of Attorneys for Industrial Customers  
of Northwest Utilities

UM 1713

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	40	\$275	\$11,000
Associate Attorney	80	\$205	\$16,400
Paralegal	10	\$150	\$1500
<i>Expert Witness Fees</i>			
Expert 1	40	\$150	\$6000
<i>Other Expenses</i>			
Travel			\$200
Printing and Postage			\$100
Subtotal			\$35,200
20% of ICNU Funded Expenditures			\$7,040
<b>Total ICNU PacifiCorp Issue Fund Grant Request</b>			<b>\$11,000</b>
<b>Total ICNU PGE Issue Fund Request</b>			<b>\$4,000</b>
<b>Total ICNU Issue Fund Request*</b>			<b>\$15,000</b>

\* ICNU is limiting the requested amount of its Issue Fund request due to the limited funds available in the PGE and PacifiCorp Issue Fund accounts.