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May 18, 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: OPUC Investigation to Explore Issues Related to a Renewable Generator's
Contribution to Capacity
Docket No. UM 1719

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 1719

In the Matter of)	REQUEST FOR FINAL PAYMENT OF
)	ISSUE FUND GRANT OF THE
PUBLIC UTILITY COMMISSION OF)	INDUSTRIAL CUSTOMERS OF
OREGON,)	NORTHWEST UTILITIES
)	
Investigation to Explore Issues Related to a)	
Renewable Generator’s Contribution to)	
Capacity.)	
_____)	

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 1719 in the amount of \$2,904.40.

On October 9, 2015, ICNU filed a Proposed Budget for an Issue Fund Grant in Docket No. UM 1719 in the amount of \$28,000. On October 14, 2015, the Commission issued Order No. 15-316, approving an Issue Fund Grant for ICNU in the amount of \$28,000. At this time, ICNU requests final payment of the approved Issue Fund Grant in Docket No. UM 1719. As described below, ICNU requests that the unused portion of the Issue Fund Grant be reallocated to Docket Nos. UE 307 and UE 308 in the amounts specified.

ICNU hereby requests that the Commission authorize final payment of the Issue Fund Grant in the amount of \$2,904.40. 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, participated in settlement conferences, and filed testimony. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU’s participation in UM 1719.

Section 7.3(c) – The Commission approved ICNU’s proposed budget on October 14, 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 \$2,904.40 from the 2016 PacifiCorp 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

ICNU is filing a Request for Issue Fund Grant and Proposed Budget in both UE 307 and UE 308 at the same time it makes this Request for Final Payment. Pursuant to Section 6.7 of the IFA, ICNU requests that the Commission reallocate the remaining \$25,095.60 of the Issue Fund Grant in this proceeding to Docket Nos. UE 307 and UE 308 as follows: \$12,547.80 to Docket No. UE 307 and \$12,547.80 to Docket No. UE 308. ICNU's involvement in this proceeding was less than originally foreseen, which has resulted in significant unused funds in the UM 1719 Issue Fund Grant. In addition, due to the limited availability of funds in the 2016 PacifiCorp and PGE Issue Fund Accounts, ICNU will require the reallocation of its unused UM 1719 Issue Fund Grant in order to meet its proposed budgets in UE 307 and UE 308. Following payment of this Request for Final Payment and reallocation of the remaining funds to Docket Nos. UE 307 and UE 308, the balance of the UM 1719 Issue Fund Grant will be zero; the amount of ICNU's UE 307 Request for Issue Fund Grant will be \$21,108; and the amount of ICNU's UE 308 Request for Issue Fund Grant will be \$30,224.

Dated this 18th day of May, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

S. Bradley Van Cleve

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