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August 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: In the Matter of PACIFICORP, dba PACIFIC POWER,
2017-2021 Renewable Portfolio Standard Implementation Plan
Docket No. UM 1754

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the Request for Final Payment and Reallocation 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 and to PacifiCorp.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1754

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER)	REQUEST FOR FINAL PAYMENT
)	AND REALLOCATION OF ISSUE
2017-2021 Renewable Portfolio Standard)	FUND GRANT OF THE INDUSTRIAL
Implementation Plan.)	CUSTOMERS OF NORTHWEST
_____)	UTILITIES
)	

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 1754 in the amount of \$4,634.67.

On January 14, 2016, ICNU filed its Proposed Budget for Issue Fund Grant in this Docket showing eligible expenses in the amount of \$10,525 and requesting an Issue Fund Grant in the amount of \$8,420. On January 26, 2016, the Commission issued Order No. 16-031, approving an Issue Fund Grant for ICNU in the amount of \$8,420. At this time, ICNU requests final payment of its approved Issue Fund Grant in Docket No. UM 1754 in the amount of \$4,634.67. As described below, ICNU requests that the unused portion the UM 1754 Issue Fund Grant be reallocated to Docket No. UE 307.

ICNU hereby requests that the Commission authorize final payment of the Issue Fund Grant in the amount of \$4,634.67 from the 2016 PacifiCorp Issue Fund. 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, analyzed PacifiCorp's Renewable Portfolio Standard Implementation Plan, and filed comments. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU's participation in UM 1754.

Section 7.3(c) – The Commission approved ICNU's initial proposed budget on January 26, 2016. 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 witness. 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

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the Commission approve final payment of ICNU's Issue Fund Grant in the amount of \$4,634.67 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.

Pursuant to Section 6.7 of the IFA, ICNU requests that the Commission reallocate the remaining \$3,785.33 of the Issue Fund Grant in this proceeding to Docket No. UE 307. ICNU expects that its participation in UE 307 will require additional time and resources that were not foreseen, and which were not outlined in its original proposed budget in that docket.

Also pursuant to Section 6.7 of the IFA, ICNU is filing an amended proposed budget in UE 307 at the same time it makes this Request for Final Payment and Reallocation of Issue Fund Grant. Upon payment of this Request for Final Payment and reallocation of funds to UE 307, the balance of the UM 1754 Issue Fund Grant will be zero, and the balance of ICNU's Amended Proposed Budget in UE 307 will be \$24,893.33.

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 August, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

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