

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com
Suite 400
333 SW Taylor
Portland, OR 97204

January 14, 2016

Via Electronic Filing

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

Re: PORTLAND GENERAL ELECTRIC COMPANY
2017-2021 Renewable Portfolio Standard Implementation Plan
Docket No. UM 1755

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 1755

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PROPOSED BUDGET FOR ISSUE
COMPANY)	FUND GRANT OF THE INDUSTRIAL
)	CUSTOMERS OF NORTHWEST
)	UTILITIES
2017-2021 Renewable Portfolio Standard)	
Implementation Plan.)	
_____)	

Pursuant to Section 6.3 of the Third Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) in Order No. 15-335 (October 20, 2015), the Industrial Customers of Northwest Utilities (“ICNU”) files this Proposed Budget in UM 1755 (the “Proceeding”) seeking an Issue Fund Grant in the amount of \$8,420. ICNU proposes that this grant be funded from the Portland General Electric Company (“PGE”) Issue Fund Account. ICNU respectfully requests that the Commission act on this Proposed Budget within fourteen days of receipt, as provided by 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 1755. PGE filed its 2017-2021 Renewable Portfolio Standard (“RPS”) Implementation Plan on December 31, 2015. 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 1755 directly affects PGE, which falls under the definition of “Participating Public Utility”

in Section 1(k) of the IFA. Therefore, UM 1755 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 clarifying sessions, workshops, conferences, public meetings, and oral presentations in UM 1755, and may conduct discovery, as necessary. ICNU will retain an expert witness to review the filing and assist in submitting any comments. In addition, PacifiCorp currently has a 2017-2021 RPS Implementation Plan pending in UM 1754, and any ICNU work that could address both filings will be equally split between the cases.

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

ICNU intends to investigate PGE's plan to meet its RPS requirements in the years 2017-2021 with bundled renewable energy certificates ("RECs") from existing Oregon-eligible resources, as well as other issues related to the filing.

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

ICNU's participation will directly benefit industrial customers who take service from PGE, as well as other PGE customers.

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

ICNU is seeking an Issue Fund Grant in the amount of \$8,420 from the PGE Issue Fund Account, established under IFA Section 4.2.3. ICNU will bear the cost of its anticipated participation to the extent that costs exceed the amount of the Proposed Budget. ICNU estimates that the amount available in the 2017-2021 PGE Issue Fund Account is \$129,802.

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

Attached as Exhibit A is ICNU's Proposed Budget. The Proposed Budget details the expected hours and hourly rates of ICNU's attorneys and expert. The Proposed Budget was developed based on the costs ICNU incurred in previous cases.

(6) Matching Funds

As required by Section 6.3(f) of the IFA, ICNU represents that it will use matching funds 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 that the case will end with a public meeting within 120 days of the implementation plan filing date. Actual expenses could be lower depending upon any early agreement by the parties; if the scope of the case is expanded, ICNU reserves the right to submit a revised budget.

Basis for Request

ICNU respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$8,420, based on the following considerations:

1. The incremental costs of compliance with renewable standards could rise significantly, and all incremental costs are included in PGE's rates paid by ICNU members who are customers of PGE.
2. ICNU will audit and review PGE's RPS Implementation Plan filing for compliance with relevant statutory and Commission rule requirements.
3. ICNU represents the interests of industrial customers and has significant experience participating in Commission proceedings involving PGE. ICNU's participation will benefit PGE industrial customers, as well as other customers of PGE.

4. Pursuant to Commission Order No. 03-502, entered on August 21, 2003, 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.

Therefore, ICNU respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount of \$8,420. ICNU prepared the attached budget on the basis of costs incurred in previous cases.

Dated this 14th of January, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

Jesse E. Cowell

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

tcp@dvclaw.com

jec@dvclaw.com

Of Attorneys for Industrial Customers
of Northwest Utilities

Exhibit A

Proposed Budget of ICNU

UM 1755

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Attorney	15	\$265	\$3,975
Paralegal	5	\$170	\$850
<i>Expert Witness Fees</i>			
Expert 1	35	\$160	\$5,600
<i>Other Expenses</i>			
Printing and Postage			\$100
Subtotal			\$10,525
<hr/>			
20% of ICNU Funded Expenditures			\$2,105
<hr/>			
Total ICNU Issue Fund Request			\$8,420