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August 15, 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 PORTLAND GENERAL ELECTRIC COMPANY,
2016 Renewable Portfolio Standard Implementation Plan
Docket No. UM 1755

Dear Filing Center:

Please find enclosed the Request for Final Payment and Reallocation of Issue Fund Grant and Confidential Exhibit A on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket. 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 Portland General Electric Company.

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)	REQUEST FOR FINAL PAYMENT
COMPANY)	AND REALLOCATION OF ISSUE
)	FUND GRANT OF THE INDUSTRIAL
2016 Renewable Portfolio Standard)	CUSTOMERS OF NORTHWEST
Implementation Plan.)	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 1755 in the amount of \$6,995.50.

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 1755 in the amount of \$6,995.50. As described below, ICNU requests that the unused portion its UM 1755 Issue Fund Grant be reallocated to Docket No. UE 308.

ICNU hereby requests that the Commission authorize final payment of the Issue Fund Grant in the amount of \$6,995.50 from the 2016 PGE 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 PGE'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 1755.

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 \$6,995.50 from the 2016 PGE 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 respectfully requests that the Commission reallocate the remaining \$1,424.50 of the Issue Fund Grant in this proceeding to Docket No. UE 308. ICNU expects that its participation in UE 308 will require time and resources in excess of those outlined in its original proposed budget in that docket. Also pursuant to Section 6.7 of the IFA, ICNU is concurrently filing a Request for Amendment of Proposed Budget in Docket No. UE 308. Upon payment of this Request for Final Payment and reallocation of funds to UE 308, the balance of the UM 1755 Issue Fund Grant will be zero, and the balance of ICNU's Amended Proposed Budget in UE 308 will be \$38,061.03 ^{1/}.

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

^{1/} This amount assumes that the Commission also grants ICNU's request to reallocate unused issue funds in Docket No. UM 1623.

Dated this 15th day of August, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

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