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September 29, 2006

Via Electronic and US Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

Re: In the Matter of PACIFIC POWER & LIGHT Request for a
General Rate Increase in the Company's Oregon Annual Revenues
Docket No. UE 179

Dear Filing Center:

Enclosed please find the Request for Payment of Issue Fund Grant of the Industrial Customers of Northwest Utilities ("ICNU") in the above-referenced docket. Please note that Attachment A to the Request has been designated confidential and will only be provided to the Commission.

For brevity and confidentiality purposes, only the amounts up to the end of the month during which ICNU's expenses surpassed the approved budget are shown in Confidential Attachment A, even though ICNU continued to incur expenses after the dates shown.

Thank you for your assistance.

Sincerely,

/s/ Christian Griffen
Christian W. Griffen

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Request for Payment on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail to those parties who waived paper service.

Dated at Portland, Oregon, this 29th day of September, 2006.

/s/ Christian Griffen
Christian W. Griffen

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 179

In the Matter of)	
)	
PACIFIC POWER & LIGHT)	REQUEST FOR PAYMENT OF ISSUE
(dba PACIFICORP))	FUND GRANT OF THE INDUSTRIAL
)	CUSTOMERS OF NORTHWEST
Request for a General Rate Increase in the)	UTILITIES
Company's Oregon Annual Revenues.)	
_____)	

Pursuant to Section 7.3 of the Intervenor Funding Agreement (“IFA”) adopted by the Oregon Public Utility Commission (“Commission”) on July 2, 2003 (Order No. 03-388), the Industrial Customers of Northwest Utilities (“ICNU”) hereby requests payment of ICNU’s Issue Fund Grant in Docket No. UE 179 in the amount of \$40,000.

On March 9, 2006, ICNU filed a Notice of Intent to Request an Issue Fund Grant in this docket. On May 8, 2006, ICNU filed a proposed budget in the amount of \$44,900. The Commission approved an Issue Fund Grant for ICNU in the amount of \$40,000 on June 1, 2006. Re PacifiCorp, OPUC Docket No. UE 179, Order No. 06-264 (June 1, 2006).

ICNU hereby requests that the Commission authorize payment of the budget in the amount of \$40,000. ICNU has expended an amount that far exceeds the approved budget in this proceeding. For brevity and confidentiality purposes, only the amounts up to the end of the month during which ICNU’s expenses surpassed the approved budget are shown in Confidential Attachment A, even though ICNU continued to incur expenses after the dates shown.

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 was a full and active participant in this Docket. ICNU conducted extensive discovery, submitted direct testimony, filed opening comments, participated in settlement workshops and discussions, drafted provisions for a stipulation to resolve all issues in this Docket, and submitted testimony and a brief in support of the stipulation. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU’s participation in UM 1209.

Section 7.3(c) – ICNU’s Issue Fund Grant was not subject to any conditions.

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 “the terms of an [intervenor funding] agreement will be binding on all organizations seeking a grant under that agreement and will be followed by the Commission in administering the agreement.” OAR § 860-012-0100(2). ICNU has satisfied the terms of the IFA and respectfully requests that the Commission approve full payment of ICNU’s Issue Fund Grant in the amount of \$40,000 within 30 days of receiving this Request for Payment as provided in Section 7.6 of the IFA.

Payment should be sent to:

Michael Early
Industrial Customers of Northwest Utilities
333 S.W. Taylor, Suite 400
Portland, Oregon 97204

Dated this 29th day of September, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

Melinda J. Davison

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Of Attorneys for Industrial Customers
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