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October 28, 2008

Via Electronic and U.S. 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 PORTLAND GENERAL ELECTRIC COMPANY's
Request for a General Rate Revision
Docket No. UE 197

Dear Filing Center:

Enclosed please find the original Request for Final Payment of Issue Fund Grant on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket. Thank you for your attention to this matter.

Sincerely yours,

/s/ Brendan E. Levenick
Brendan E. Levenick

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Request for Final Payment of Issue Fund Grant 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, where paper service has not been waived.

Dated at Portland, Oregon, this 28th day of October, 2008.

/s/ Brendan E. Levenick
Brendan E. Levenick

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 197

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) REQUEST FOR FINAL PAYMENT OF
COMPANY) ISSUE FUND GRANT OF THE
) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
Request for General Rate Revision.)
)
_____)

Pursuant to Section 7.3 of the First Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) by Order No. 07-564 (December 19, 2007), the Industrial Customers of Northwest Utilities (“ICNU”) hereby requests final payment of ICNU’s Issue Fund Grant in Docket No. UE 197 in the amount of \$24,914.27.

On February 29, 2008, ICNU filed a Notice of Intent to Request an Issue Fund Grant in Docket No. UE 197. On May 28, 2008, ICNU filed a proposed budget in the amount of \$83,248 in Docket No. UE 197. The Commission approved an Issue Fund Grant for ICNU in the amount of \$83,248 on June 9, 2008. Re PGE, OPUC Docket No. UE 197, Order No. 08-313 (June 9, 2008). On August 27, 2008, ICNU filed a Request for Partial Payment in the amount of \$58,333.73. As a result, ICNU has an approved Issue Fund Grant remaining balance of \$24,914.27 in this proceeding. At this time, ICNU requests the final payment of the approved Issue Fund Grant in Docket No. UE 197.

ICNU hereby requests that the Commission authorize final payment of the Issue Fund Grant in the amount of \$24,914.27. ICNU's expenses are shown in Confidential Attachment A.

This Request for Payment satisfies the requirements of the IFA as follows:

Section 6.6 – As required by Section 6.6 of the IFA, ICNU cooperated with CUB to jointly sponsor and share the cost of two witnesses.

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 conducted discovery, filed direct and surrebuttal testimony, participated in workshops and settlement discussions, filed an opening brief, and negotiated a partial settlement of this case. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU's participation in UE 197.

Section 7.3(c) – The Commission approved ICNU's proposed budget on June 9, 2008. 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 7.4 – 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 final payment of ICNU's Issue Fund Grant in the amount of \$24,914.27

within 30 days of receiving this Request for Final Payment as provided in Section 7.6 of the IFA.

This Request for Payment constitutes a Final Request for Payment in this docket.

Payment should be sent to:

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

Dated this 28th day of October, 2008.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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