

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 200

In the Matter of)	
)	REQUEST FOR PARTIAL PAYMENT OF
PACIFICORP)	ISSUE FUND GRANT OF THE
)	INDUSTRIAL CUSTOMERS OF
2009 Renewable Energy Adjustment Clause)	NORTHWEST UTILITIES
_____)	
)	

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 partial payment of ICNU’s Issue Fund Grant in Docket No. UE 200 in the amount of \$24,804.17.

On April 2, 2008, ICNU filed a Notice of Intent to Request an Issue Fund Grant in Docket No. UE 200. On May 13, 2008, ICNU filed a proposed budget in the amount of \$70,020 in Docket No. UE 200. Per the Commission’s request, ICNU filed a letter clarifying it intends to use in-house resources to pay for 20% of the total amount expended in this docket. The Commission approved an Issue Fund Grant for ICNU in the amount of \$70,020 on May 19, 2008. Re PacifiCorp, OPUC Docket No. UE 200, Order No. 08-259 (May 19, 2008). As a result, ICNU has an approved Issue Fund grant of \$70,020 in this proceeding.

ICNU hereby requests that the Commission authorize partial payment of the Issue Fund Grant in the amount of \$24,804.17. 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 a full and active participant in this Docket. ICNU conducted discovery, filed direct and surrebuttal testimony, participated in workshops and settlement discussions, and intends to participate in any hearings and file legal briefs. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU’s participation in Docket No. UE 200.

Section 7.3(c) – The Commission approved the proposed budget on May 19, 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 partial payment of ICNU’s Issue Fund Grant in the amount of \$24,804.17 within 30 days of receiving this Request for Partial Payment as provided in Section 7.6 of the IFA. This Request for Payment constitutes a Partial 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 27th day of August, 2008.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve
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August 27, 2008

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 PACIFICORP 2009 Renewable Energy Adjustment
Clause
Docket No. UE 200

Dear Filing Center:

Enclosed please find the original Request for Partial 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.

Thank you for your assistance.

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 Partial 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 27th day of August, 2008.

/s/ Brendan E. Levenick
Brendan E. Levenick

<p>CITIZENS' UTILITY BOARD OF OREGON (W) ROBERT JENKS OPUC DOCKETS 610 SW BROADWAY STE 308 PORTLAND OR 97205 dockets@oregoncub.com bob@oregoncub.org</p>	<p>DEPARTMENT OF JUSTICE (W) MICHAEL T WEIRICH 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@doj.state.or.us</p>
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