

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 264

In the Matter of)	
)	
PACIFICORP)	PROPOSED BUDGET FOR
)	ISSUE FUND GRANT OF THE
2014 Transmission Adjustment Mechanism)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
)	
)	

Pursuant to Section 6.3 of the Second Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) by Order No. 12-452 (November 7, 2012), the Industrial Customers of Northwest Utilities (“ICNU”) files this Proposed Budget in UE 264 (the “Proceeding”) seeking an Issue Fund Grant in the amount of \$28,601. Unless ICNU makes another request pursuant to the IFA, ICNU will bear its costs in this Proceeding that exceed \$28,601. ICNU proposes that this grant be funded from the PacifiCorp Issue Fund Account. ICNU respectfully requests that the Commission act on this Proposed Budget within fourteen days of receipt, as provided in 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 UE 264, which is a proceeding to consider PacifiCorp’s 2014 Transmission Adjustment Mechanism (“TAM”). 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). UE 264 directly affects PacifiCorp, which falls under the definition of “Participating Public Utility” in Section 1(k) of

the IFA. Therefore, UE 264 is an Eligible Proceeding and an Issue Fund Grant may be made for this proceeding under Section 6.1 of the IFA.

ICNU will participate in all aspects of UE 264, including attending all clarifying sessions, workshops, settlement conferences, public meetings, oral presentations, and hearings. ICNU plans to conduct extensive discovery in this proceeding. In addition, ICNU will submit expert witness testimony and briefs, as called for by the procedural schedule in this Docket.

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

ICNU intends to investigate numerous aspects of PacifiCorp's 2014 TAM, including PacifiCorp's power costs, direct access credits, and other issues raised by PacifiCorp's filing or by other parties.

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

ICNU's participation will directly benefit industrial customers, as well as other large non-residential customers who purchase service from PacifiCorp or wish to purchase power from third parties.

(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 \$28,601. Unless ICNU makes another request pursuant to the IFA, ICNU will bear the cost of its participation to the extent that its costs exceed the amount of the Proposed Budget. ICNU proposes that the grant amount be allocated from the PacifiCorp Issue Fund Account established under IFA Section 4.2.3. ICNU estimates that the uncommitted amount available in the 2013 PacifiCorp Issue Fund Account is \$103,570. ICNU and CUB have coordinated their activities in UE 263 and UE 264 to

maximize the efficient use of the amounts available in the 2013 PacifiCorp Issue Fund. ICNU and CUB have agreed to split the remaining issue fund amounts with \$44,969 for CUB and \$58,601 for ICNU. ICNU plans to use \$28,601 of its remaining uncommitted issue fund amounts for this proceeding (Docket No. UE 264) and \$30,000 for the PacifiCorp general rate case proceeding (Docket No. UE 263).

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

Attached as Exhibit A is ICNU's Proposed Budget in UE 264. The Proposed Budget details the expected hours and hourly rates of ICNU's attorneys and experts. The Proposed Budget was developed based on the costs ICNU incurred in previous PacifiCorp cases.

(6) Matching Funds:

As required by Section 6.3(g) 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 a fully litigated case. If the case is settled prior to hearing, actual expenses could be lower.

Basis for Request

ICNU respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$28,601 based on the following considerations:

1. In this proceeding, PacifiCorp forecasts a \$1 million rate decrease, which PacifiCorp states will decrease rates by an average of 0.1%, although large customers over 1 megawatt will experience a 1% overall rate increase.

2. ICNU represents the interests of industrial customers and has significant experience participating in Commission proceedings involving PacifiCorp's power costs. ICNU filed power cost testimony in all of PacifiCorp's past TAM cases, including Docket No. UE 245, PacifiCorp's most recent TAM proceeding. In addition, ICNU has participated in numerous previous rate cases of PacifiCorp. Thus, ICNU possesses significant interest and expertise with respect to the subject matter of this proceeding. ICNU's participation will benefit PacifiCorp's industrial, as well as other PacifiCorp customers.

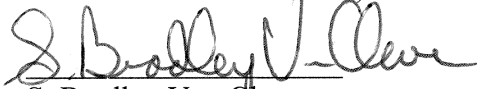
4. ICNU has been precertified under Sections 5.1 and 5.2 of the IFA and OAR § 860-001-0120(3)(b), as eligible to receive an Issue Fund Grant, by Commission Order No. 03-502, which was entered on August 21, 2003.

Therefore, ICNU respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount specified above.

Dated this 15th day of May, 2013.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



S. Bradley Van Cleve

Irion A. Sanger

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

bvc@dvclaw.com

ias@dvclaw.com

Of Attorneys for Industrial Customers
of Northwest Utilities

Exhibit A

Proposed Budget of ICNU

UE 264

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	25	\$250.00	\$6,250
Associate Attorney	120	\$205.00	\$24,600
Paralegal	50	\$125.00	\$6,250
<i>Expert Witness Fees</i>			
Expert 1	182	\$150.00	\$27,300
Expert 2	14	\$205	\$2,870
<i>Other Expenses</i>			
Travel			\$500
Printing and Postage			\$500
Subtotal			\$68,270
20% of Eligible Expenses			\$13,654
ICNU PacifiCorp Issue Fund Grant Eligibility			\$54,616
Total ICNU PacifiCorp Issue Fund Grant Proposed Budget			\$28,601

Davison Van Cleve PC

Attorneys at Law

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

May 15, 2013

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 PACIFICORP 2014 Transition Adjustment Mechanism
Docket No. UE 264

Dear Filing Center:

Enclosed please find the original and one (1) copy of the Proposed Budget for Issue Fund Grant of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Thank you for your assistance.

Sincerely,

/s/ Jesse Gorsuch
Jesse Gorsuch

Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Proposed Budget for Issue Fund Grant of the Industrial Customers of Northwest Utilities upon all parties in this proceeding by causing the same to be sent via electronic mail to each individual's last-known email address, as listed below.

Dated at Portland, Oregon, this 15th day of May, 2013.

Sincerely,

/s/ Jesse Gorsuch
Jesse Gorsuch

(W) PACIFIC POWER
SARAH WALLACE
SENIOR COUNSEL
825 NE MULTNOMAH STE 1800
PORTLAND OR 97232
sarah.wallace@pacificorp.com

(W) PACIFICORP, DBA PACIFIC POWER
OREGON DOCKETS
825 NE MULTNOMAH ST, STE 2000
PORTLAND OR 97232
oregondockets@pacificorp.com

(W) PUC STAFF – DEPARTMENT OF JUSTICE
JASON W JONES
BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4096
jason.w.jones@state.or.us

(W) MCDOWELL RACKNER & GIBSON PC
KATHERINE MCDOWELL
419 SW 11TH AVE., SUITE 400
PORTLAND OR 97205
katherine@mcd-law.com

(W) PUBLIC UTILITY COMMISSION OF OREGON
JOHN CRIDER
PO BOX 2148
SALEM OR 97308-2148
john.crider@state.or.us

(W) CITIZENS' UTILITY BOARD OF OREGON
OPUC DOCKETS
ROBERT JENKS
G. CATRIONA MCCracken
610 SW BROADWAY, STE 400
PORTLAND OR 97205
dockets@oregoncub.org
bob@oregoncub.org
catriona@oregoncub.org

(W) ENERGY STRATEGIES LLC
KEVIN HIGGINS
215 STATE ST - STE 200
SALT LAKE CITY UT 84111-2322
khiggins@energystrat.com

(W) NOBLE AMERICAS ENERGY SOLUTIONS, LLC
GREG BASS
401 WEST A ST., STE. 500
SAN DIEGO CA 92101
gbass@noblesolutions.com

(W) RICHARDSON & O'LEARY

GREGORY M ADAMS
PO BOX 7218
BOISE ID 83702
greg@richardsonandoleary.com

**REGULATORY & COGENERATION
SERVICES INC**

DONALD W. SCHOENBECK
900 WASHINGTON ST, STE
VANCOUVER WA 98660-3455
dws@r-c-s-inc.com

**(W) PORTLAND GENERAL ELECTRIC
SERVICES INC**

JAY TINKER
121 SW SALMON 1WTC13
PORTLAND OR 97204
pge.opuc.filings@pgn.com

(W) SAFEWAY INC.

LISSA MALDONADO
GEORGE WAIDELICH
5918 STONERIDGE MALL ROAD
PLEASANTON OR 94588-3229
lissa.maldonado@safeway.com
george.waidelich@safeway.com

(W) PORTLAND GENERAL ELECTRIC

DOUGLAS C. TINGEY
121 SW SALMON 1WTC13
PORTLAND OR 97204
doug.tingey@pgn.com