### **BEFORE THE PUBLIC UTILITY COMMISSION**

#### **OF OREGON**

#### **UM 1713**

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PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of

Investigation into Large Customer Energy Efficiency Limitations.

NOTICE OF INTENT TO REQUEST AN ISSUE FUND GRANT OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

The Industrial Customers of Northwest Utilities ("ICNU") files this Notice of Intent to Request an Issue Fund Grant in Docket No. UM 1713, pursuant to OAR § 860-001-0120 and the Second Amended and Restated Intervenor Funding Agreement ("IFA"), approved by the Oregon Public Utility Commission ("Commission") in Order No. 12-452 (November 7, 2012).

1. The Commission opened this investigation pursuant to Order No. 14-415 and docketed the filing as UM 1713. The investigation will address, among other issues, whether barriers exist that prevent the Energy Trust of Oregon ("ETO") from obtaining all costeffective energy efficiency from large customers, and, if such barriers exist, what other options may exist to allow the ETO to gain all cost-effective energy efficiency.

2. UM 1713 is an Eligible Proceeding under the IFA. 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). UM 1713 will directly affect PGE and PacifiCorp, which are Participating Public Utilities under Section 1(k) of the IFA. Therefore, an Issue Fund Grant may be made for this proceeding under Section 6.1 the IFA.

PAGE 1 – NOTICE OF INTENT TO REQUEST AN ISSUE FUND GRANT OF ICNU

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242 3. As required by Section 6.2 of the IFA, this Notice of Intent is being filed at the time ICNU is requesting intervention in UM 1713.

4. As required by Section 6.2 of the IFA, this Notice of Intent is being served on each affected Participating Public Utility, all precertified organizations, and all parties identified on the service list from UM 1713.

5. ICNU identifies the PGE and PacifiCorp Issue Fund Accounts as the accounts from which ICNU intends to request the Issue Fund Grant.

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.

7. ICNU requests that the Commission establish a deadline by which ICNU must file a proposed budget with respect to the Issue Fund Grant, as provided in Section 6.3 of the IFA.

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242 Dated this 4th day of February, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

S. Bradley Van Cleve Tyler C. Pepple Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, Oregon 97204 (503) 241-7242 phone (503) 241-7242 phone (503) 241-8160 facsimile bvc@dvclaw.com tcp@dvclaw.com Of Attorneys for the Industrial Customers of Northwest Utilities

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Suite 400 333 SW Taylor Portland, OR 97204

February 4, 2015

Via E-Mail and Federal Express

Public Utility Commission of Oregon Attn: Filing Center 3930 Fairview Industrial Drive SE Salem OR 97302

# Re: PUBLIC UTILITY COMMISSION OF OREGON Investigation into Large Customer Energy Efficiency Limitations Docket No. UM 1713

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of the Notice of Intent to Request Issue Fund Grant of the Industrial Customers of Northwest Utilities.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

Jesse O. Gorsuch

Enclosures cc: Service List

### **CERTIFICATE OF SERVICE**

### I HEREBY CERTIFY that I have this day served the attached **Notice of Intent to**

#### Request an Issue Fund Grant of the Industrial Customers of Northwest Utilities upon all

parties in this proceeding, as shown below, by causing a copy to be sent via electronic mail.

Dated at Portland, Oregon, this 4th day of February, 2015.

Jesse O. Gorsuch

(W) CITIZENS' UTILITY BOARD OF OREGON **OPUC DOCKETS ROBERT JENKS** SOMMER TEMPLET 610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org bob@oregoncub.org sommer@oregoncub.org

### (W) ENERGY TRUST OF OREGON

DEBBIE GOLDBERG MENASHE FRED GORDON ELAINE PRAUSE 421 SW OAK ST, STE. 300 PORTLAND, OR 97204 debbie.goldbergmenashe@energytrust.org fred.gordon@energytrust.org elaine.prause@energytrust.org

(W) CITY OF PORTLAND - PLANNING & SUSTAINABILITY DAVID TOOZE 1900 SW 4TH STE 7100 PORTLAND OR 97204 david.tooze@portlandoregon.gov

# (W) PUC STAFF – DEPARTMENT **OF JUSTICE** MICHAEL T. WEIRICH **BUSINESS ACTIVITIES SECTION** 1162 COURT ST NE SALEM, OR 97301-4796 michael.weirich@state.or.us

## (W) PUBLIC UTILITY COMMISSION **OF OREGON**

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