

Davison Van Cleve PC

Attorneys at Law

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

October 31, 2016

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC CO.
2016 Integrated Resource Plan
Docket No. LC 66

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the Notice of Intent to Request an 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,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 66

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	NOTICE OF INTENT TO REQUEST
COMPANY,)	AN ISSUE FUND GRANT OF THE
)	INDUSTRIAL CUSTOMERS OF
2016 Integrated Resource Plan)	NORTHWEST UTILITIES
_____)	

The Industrial Customers of Northwest Utilities (“ICNU”) files this Notice of Intent to Request an Issue Fund Grant in Docket No. LC 66, pursuant to OAR § 860-001-0120 and the Third Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 15-335 (Oct. 20, 2015).

1. On November 15, 2016, Portland General Electric Company (“PGE”) expects to file its 2016 Integrated Resource Plan. The Commission has docketed the filing as Docket No. LC 66.

2. LC 66 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). LC 66 will directly affect PGE, which is a Participating Public Utility under Section 1(k) of the IFA. Therefore, an Issue Fund Grant may be made for this proceeding under Section 6.1 the IFA.

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 LC 66.

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 LC 66.

5. ICNU identifies the 2017 PGE Issue Fund Account as the account from which ICNU intends to request the Issue Fund Grant. Pursuant to Section 4.4 of the IFA, ICNU requests that the Issue Fund Grant be drawn from the 2017 PGE Issue Fund, as ICNU expects the proceeding will continue well into 2017, and remaining funds for 2016 are inadequate.

6. 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.

Dated this 31st day of October, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

Davison Van Cleve, P.C.

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

tcp@dvclaw.com

Of Attorneys for the Industrial Customers

of Northwest Utilities