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April 19, 2011

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 OREGON PUBLIC UTILITY STAFF Requesting the
Commission direct PORTLAND GENERAL ELECTRIC COMPANY to file
tariffs establishing automatic adjustment clauses under the terms of SB 408.
Docket No. UE 178(4)

Dear Filing Center:

Enclosed please find the original and one copy of the Request for Final Payment of Issue Fund Grant and Confidential Exhibit A on behalf of the Industrial Customers of Northwest Utilities ("ICNU"). Pursuant to Section 7.3 of the Intervenor Funding Agreement, Confidential Exhibit A is being submitted in a separate sealed envelope to the Commission and PGE.

Thank you for your assistance, and please do not hesitate to contact our office if you have any additional questions.

Sincerely yours,

/s/ Sarah A. Kohler
Sarah A. Kohler

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 foregoing document to be deposited, postage-prepaid, in the U.S. Mail, or by service via electronic mail to those parties who waived paper service.

Dated at Portland, Oregon, this 19th day of April, 2011.

/s/ Sarah A. Kohler
Sarah A. Kohler

CITIZENS' UTILITY BOARD OF OREGON (W)

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DEPARTMENT OF JUSTICE

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 178(4)

In the Matter of)	
)	
OREGON PUBLIC UTILITY)	REQUEST FOR FINAL PAYMENT OF
COMMISSION STAFF directing:)	ISSUE FUND GRANT
)	OF THE INDUSTRIAL CUSTOMERS
PORTLAND GENERAL ELECTRIC)	OF NORTHWEST UTILITIES
COMPANY)	
)	
to File Tariffs Establishing Automatic)	
Adjustment Clauses Under the Terms of)	
SB 408.)	

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 178(4) in the amount of \$35,738.

On November 16, 2010, ICNU filed a Notice of Intent to Request an Issue Fund Grant in Docket No. UE 178(4). On November 30, 2010, ICNU filed a proposed budget in the amount of \$35,738 in Docket No. UE 178(4). On January 5, 2011, the Commission denied ICNU’s request for an Issue Fund Grant, but allowed ICNU to file revised budgets, which it did on January 12, 2011. Re Portland Gen. Elec. Co., OPUC Docket No. UE 178, Order No. 11-002 (Jan. 5, 2011). The Commission approved ICNU’s revised budget and granted ICNU an Issue Fund Grant in the amount of \$35,738 on January 19, 2011. Re Portland Gen. Elec. Co., OPUC Docket No. UE 178, Order No. 11-023 (Jan. 19, 2011). ICNU’s total expenditure on this case

greatly exceeded the twenty percent required for an Issue Fund Grant. The Issue Fund Grant amount requested in this case will essentially cover the cost of discovery and ICNU's participation in settlement discussions.

ICNU hereby requests that the Commission authorize final payment of the Issue Fund Grant in the amount of \$35,738. 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 was a full and active participant in this Docket. ICNU conducted discovery, participated in settlement workshops and discussions, and filed testimony. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU's participation in UE 178(4).

Section 7.3(c) – The Commission approved ICNU's proposed budget on January 19, 2011. 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. 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 § 860-001-0120(2). ICNU has satisfied the terms of the IFA and respectfully requests that

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the Commission approve final payment of ICNU's Issue Fund Grant in the amount of \$35,738 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
1300 SW Fifth Ave., Suite 1750
Portland, Oregon 97201

Dated this 19th day of April, 2011.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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