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February 5, 2007

***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 PORTLAND GENERAL ELECTRIC COMPANY  
Request for a General Rate Revision  
**Docket Nos. UE 180/UE 181/UE 184**

Dear Filing Center:

Enclosed please find an original and one copy of the Request for Payment of Issue Fund Grant of the Industrial Customers of Northwest Utilities in the above-referenced docket numbers.

The attachment is confidential and is only being provided to the Commission.  
Thank you for your assistance.

Sincerely yours,

/s/ Christian Griffen  
Christian W. Griffen

Enclosures  
cc: Service List

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Request for Payment of Issue Fund Grant of the Industrial Customers of Northwest Utilities upon the parties, on the official service list, by causing the same to be electronically served, to those parties with an email address, as well as mailed, postage-prepaid, through the U.S. Mail, to those parties which have not waived paper service.

Dated at Portland, Oregon, this 5th day of February, 2007.

/s/ Christian Griffen  
Christian W. Griffen

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 180**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC COMPANY	)	REQUEST FOR PAYMENT OF ISSUE FUND GRANT OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES
Request for a General Rate Revision	)	
_____	)	

Pursuant to Section 7.3 of the Intervenor Funding Agreement (“IFA”) adopted by the Oregon Public Utility Commission (“Commission”) on July 2, 2003 (Order No. 03-388), the Industrial Customers of Northwest Utilities (“ICNU”) hereby requests payment of ICNU’s Issue Fund Grant in Docket No. UE 180 in the amount of \$100,000.

On March 21, 2006, ICNU filed a Notice of Intent to Request an Issue Fund Grant in this docket. On May 30, 2006, ICNU filed a proposed budget in the amount of \$100,000. The Commission approved an Issue Fund Grant for ICNU in the amount of \$100,000 on June 8, 2006. Re Portland General Electric Company, OPUC Docket No. UE 180, Order No. 06-289 (June 8, 2006).

ICNU hereby requests that the Commission authorize payment of the budget in the amount of \$100,000. ICNU has expended an amount that far exceeds the approved budget in this proceeding. For brevity and confidentiality purposes, only the amounts up to the end of the month during which ICNU’s expenses surpassed the approved budget are shown in Confidential Attachment A, even though ICNU continued to incur expenses after the dates shown.

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 extensive discovery, submitted direct and surrebuttal testimony, filed an opening, a closing, and a prehearing brief, participated in settlement workshops and discussions, drafted provisions for stipulations to resolve several issues in this Docket, submitted hearing exhibits, and presented oral arguments. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU’s participation in UE 180.

**Section 7.3(c)** – ICNU’s Issue Fund Grant was not subject to any conditions.

**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 full payment of ICNU’s Issue Fund Grant in the amount of \$100,000 within 30 days of receiving this Request for Payment as provided in Section 7.6 of the IFA.

Payment should be sent to:

Michael Early  
Industrial Customers of Northwest Utilities  
333 S.W. Taylor, Suite 400  
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Dated this 5th day of February, 2007.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

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