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October 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 No. UE 188

Dear Filing Center:

Enclosed please find the Proposed Budget for Issue Fund Grant of the Industrial Customers of Northwest Utilities in the above-captioned docket.

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 Proposed Budget for Issue Fund Grant of the Industrial Customers of Northwest Utilities upon the parties on the official service list by causing the same to be served via electronic and US Mail, to those parties which have not waived paper service in this proceeding.

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

/s/ Christian Griffen
Christian W. Griffen

CITIZENS' UTILITY BOARD OF OREGON

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DEPARTMENT OF JUSTICE

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(W) = Waive Paper Service

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 188

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

Pursuant to Section 6.3 of the Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) in Order No. 03-388 (July 2, 2003), the Industrial Customers of Northwest Utilities (“ICNU”) files this Proposed Budget in UE 188 for an Issue Fund Grant in the amount of \$20,000. Although ICNU’s budget exceeds \$20,000, ICNU is only requesting \$20,000 through an Issue Fund Grant. ICNU will bear all its costs in this proceeding that exceed \$20,000 in order to leave additional Issue Funds available for other parties and future proceedings. ICNU proposes that this grant be funded from the Portland General Electric Company (“PGE”) Issue Fund Account. ICNU respectfully requests that the Commission act on this Proposed Budget within fourteen days of receipt, as provided by 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 188. In UE 188, PGE filed an application to revise its tariffs. 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 188 directly affects PGE, which falls under the definition of “Participating Public Utility” in Section 1(k) of the IFA. Therefore, UE 188 is an Eligible Proceeding and an Issue Fund Grant may be made for this proceeding under Section 6.1 of the IFA.

ICNU has attended all clarifying sessions, workshops, settlement conferences, public meetings, oral presentations and hearings in UE 188. In addition, ICNU has submitted 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 has investigated the request for a rate revision filed by the Applicants with the Commission on March 2, 2007. ICNU has reviewed issues regarding PGE’s proposal for recovering the costs of the Biglow Canyon wind generating facility and the implementation of an appropriate tariff.

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

ICNU’s participation will directly benefit industrial and all other large non-residential customers who purchase service from PGE. In addition, ICNU has participated in previous rate cases of PGE. Thus, ICNU possesses significant interest and expertise with respect to this proceeding.

(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 \$20,000. ICNU will bear the cost of its participation to the extent that its costs exceed the amount requested. ICNU

proposes that the grant amount be allocated from the PGE Issue Fund Account established under IFA Section 4.2.3.

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

Attached as Exhibit A is ICNU's proposed budget in UE 188.

(6) Basis for Request

ICNU respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$20,000 based on the following considerations:

1. In this proceeding, PGE proposed to increase rates by approximately \$13 million to reflect the costs of PGE's new Biglow Canyon I wind plant. As a result, UE 188 will have a direct impact on PGE's customers.

2. UE 188 raises a threshold question regarding whether it is appropriate to selectively include a new generating facility in rates without reviewing all costs in a general rate case. ICNU has addressed this question in testimony and briefing.

3. ICNU represents the interests of industrial customers and has significant experience participating in Commission proceedings involving the acquisition of PGE. ICNU's participation will benefit all PGE industrial customers.

4. ICNU has been pre-certified under Section 5.1 of the IFA and OAR § 860-012-0100(3) as eligible to receive an Issue Fund Grant by 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 5th day of October, 2007.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

Melinda J. Davison

Irion A. Sanger

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Of Attorneys for Industrial Customers
of Northwest Utilities

Exhibit AICNU Proposed Budget for Issue Fund Grant

<u>Category</u>	<u>Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Cost</u>
<i>Discovery</i>	Sr. Attorney	5	215.00	1,075.00
Draft data requests, respond to data requests, organize discovery, review discovery responses, discovery disputes, depositions	Assoc. Attorney	12	175.00	2,100.00
<i>Case Preparation</i>	Sr. Attorney	8	215.00	1,720.00
Review filings and testimony, legal research, develop case strategy, prepare testimony, communications with expert witnesses, prepare issue statements	Assoc. Attorney	26	175.00	4,550.00
<i>Procedural Matters</i>	Sr. Attorney	1	215.00	215.00
Draft and review pleadings, hearings regarding procedural issues	Assoc. Attorney	5	175.00	875.00
<i>Settlement</i>	Sr. Attorney	5	215.00	1,075.00
Prepare for and attend settlement meetings, draft settlement documents	Assoc. Attorney	20	175.00	3,500.00
<i>Communication</i>	Sr. Attorney	2	215.00	430.00
Meetings and communications with clients and third parties	Assoc. Attorney	6	175.00	1,050.00
<i>Hearings/Workshops</i>	Sr. Attorney	0	215.00	0.00
Preparation and attendance at hearings, workshops and other Commission sponsored meetings	Assoc. Attorney	10	175.00	1,750.00
<i>Briefing</i>	Sr. Attorney	7	215.00	1,505.00
Draft briefs, legal research related to briefs	Assoc. Attorney	35	175.00	6,125.00
	Total Hours	142	Sub-Total	25,970.00
<u>Expert Witness Fees</u>				
Expert Witness				12,000.00
			Sub-Total	12,000.00
<u>Expenses</u>				
Travel Expenses (Mileage)				100.00
Consultant Travel Expenses				0.00
Printing and Reproduction				200.00
			Sub-Total	300.00
			<u>Grand Total</u>	38,270.00

ICNU PGE Issue Fund Grant Proposed Budget: \$20,000

(ICNU is requesting less money than it expects to expend in this docket.)