

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 266

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PROPOSED BUDGET FOR
COMPANY)	ISSUE FUND GRANT OF THE
)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
Net Variable Power Costs (NVPC) and)	
Annual Power Cost Update (APUC))	

Pursuant to Section 6.3 of the Second Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (Commission) by Order No. 12-452 (November 7, 2012), the Industrial Customers of Northwest Utilities (“ICNU”) files this Proposed Budget in UE 266 (the “Proceeding”) seeking an Issue Fund Grant in the amount of \$30,400. ICNU will bear all its costs in this Proceeding that exceed \$30,400. 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 in 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 retained Davison Van Cleve, P.C. to represent ICNU in UE 262, which is a proceeding to consider PGE’s 2013 General Rate Case (“GRC”). On March 11, 2013, ALJ Arlow bifurcated UE 262 into two proceedings, opening UE 266 to examine PGE’s Net Variable Power Costs (“NVPC”) and its Annual Power Cost Update (“APCU”) on an accelerated schedule, and making all parties to UE 262 automatically parties in UE 266.

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 266 directly affects PGE, which falls under the definition of “Participating Public Utility” in Section 1(k) of the IFA. Therefore, UE 266 is an Eligible Proceeding and an Issue Fund Grant may be made for this proceeding under Section 6.1 of the IFA.

ICNU will participate in all aspects of UE 266, including attending all clarifying sessions, workshops, settlement conferences, public meetings, oral presentations, and hearings. ICNU plans to conduct extensive discovery in this proceeding. In addition, ICNU will submit 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 intends to investigate numerous aspects of PGE’s 2013 NVPC and APCU, including whether the power costs included in PGE’s Monet model are fair, just and reasonable.

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

ICNU’s participation will directly benefit industrial customers, as well as other large non-residential customers who purchase service from PGE.

(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 \$30,400. ICNU will bear the cost of its participation to the extent that its costs exceed the amount of the Proposed Budget. ICNU proposes that the grant amount be allocated from the PGE Issue Fund Account established under IFA Section 4.2.3. ICNU estimates that the amount available in the 2013 PGE Issue Fund

Account is \$220,948.33. ICNU and CUB have coordinated their activities in UE 262 and UE 266, to maximize the efficient use of the amounts available in the 2013 PGE Issue Fund.

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

Attached as Exhibit A is ICNU's Proposed Budget in UE 266. The Proposed Budget details the expected hours and hourly rates of ICNU's attorneys and experts. The Proposed Budget was developed based on the costs ICNU incurred in previous PGE power cost cases.

(6) Matching Funds

As required by Section 6.3(f) of the IFA, ICNU represents that it will use matching funds in the form of either in-house resources or outside funding to account for or pay at least 20% of the Eligible Expenses for which ICNU is seeking an Issue Fund Grant. ICNU's proposed budget assumes a fully litigated case. If the case is settled prior to hearing, actual expenses could be lower.

Basis for Request

ICNU respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$30,400 based on the following considerations:

1. ICNU represents the interests of industrial customers and has significant experience participating in Commission proceedings involving PGE's net power costs. ICNU filed power cost testimony in UE 250 and UE 228, PGE's most recent AUT cases, and UE 215, PGE's most recent general rate case. In addition, ICNU has participated in numerous previous rate cases of PGE. Thus, ICNU possesses significant interest and expertise with respect to the

subject matter of this proceeding. ICNU's participation will benefit PGE industrial as well as other PGE customers.

4. 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.

Therefore, ICNU respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount specified above.

Dated this 15th day of April, 2013.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

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Of Attorneys for Industrial Customers
of Northwest Utilities

Exhibit A

Proposed Budget of ICNU

UE 266

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	30	\$240.00	\$7,200
Associate Attorney	30	\$195.00	\$5,850
Paralegal	13	\$125.00	\$1,625
<i>Expert Witness Fees</i>			
Witness 1 (Discovery, Travel, Testimony, and Hearing)	125	\$150	\$18,750
Witness 2	15	\$205	\$3,075
<i>Other Expenses</i>			
Travel			\$500
Copying and Postage			\$500
Subtotal			\$38,000
Less 20% In-House Resources			\$7,600
Amount of Request			\$30,400

Davison Van Cleve PC

Attorneys at Law

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April 15, 2013

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
2013 Request for a General Rate Revision
Docket No. UE 266

Dear Filing Center:

Enclosed please find the original and one (1) copy of the Proposed Budget for Issue Fund Grant of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Thank you for your attention to this matter.

Sincerely yours,

/s/ Jesse Gorsuch
Jesse Gorsuch

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Proposed Budget on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail where paper service has been waived.

Dated at Portland, Oregon, this 15th day of April, 2013

/s/ Jesse Gorsuch
Jesse Gorsuch

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