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February 26, 2018

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.
2018 Request for a General Rate Revision
Docket No. UE 335

Dear Filing Center:

Please find enclosed 1) the Notice of Intent to Request Issue Fund Grant of the Industrial Customers of Northwest Utilities (“ICNU”) and 2) the Request for Issue Fund Grant and Proposed Budget of ICNU in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 335

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

The Industrial Customers of Northwest Utilities (“ICNU”) files this Notice of Intent to Request an Issue Fund Grant in Docket No. UE 335, pursuant to OAR § 860-001-0120 and the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 18-017 (January 17, 2018).

1. On February 15, 2018, Portland General Electric (“PGE” or the “Company”) filed its Request for a General Rate Revision for 2018. The Commission docketed the filing as UE 335.

2. UE 335 is an Eligible Proceeding for Issue Funds under the IFA. The IFA defines an Eligible Proceeding for Issue Funds as, among other things, “a proceeding before the Commission to review: (i) general rate request” IFA, Article 1(c). UE 335 is a general rate request. Accordingly, an Issue Fund Grant may be made for this proceeding under Article 6.1 the IFA.

3. As required by Article 6.2 of the IFA, this Notice of Intent is being filed concurrently with ICNU’s petition to intervene in Docket No. UE 335.

4. Also as required by Article 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 for UE 335.

5. ICNU identifies the PGE Issue Fund Account as the account from which ICNU intends to request the Issue Fund Grant.

6. ICNU has been precertified under Articles 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. Pursuant to Article 6.3 of the IFA, ICNU files this Request for Issue Fund Grant and Proposed Budget in Docket No. UE 335 (the “Proceeding”) in the amount of \$50,000. If additional PGE Issue Funds become available, ICNU reserves the right to file an amended proposed budget and request an additional Issue Fund Grant. ICNU proposes that this grant be drawn from the 2018 PGE Issue Fund Account and respectfully requests that the Commission act on this Proposed Budget within fourteen days of receipt, as provided in Article 6.4 of the IFA. The following information is provided in accordance with Article 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 335, which is an Eligible Proceeding for Issue Funds under the IFA. The IFA defines an Eligible Proceeding for Issue Funds as, among other things, “a proceeding before the Commission to review: (i) general rate request” IFA, Article 1(c). UE 335 is a general rate request from PGE.

Accordingly, an Issue Fund Grant may be made for this proceeding under Article 6.1 the IFA.

ICNU will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in UE 335, and plans to conduct 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 2018 request for a general rate revision, including PGE's cost of capital, rate spread/rate design, power costs, general revenue requirement issues, pricing proposals for large customers, proposed changes to PGE's direct access program, and any other issues identified through discovery.

(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 all other large non-residential customers of PGE.

(4) Identification of the specific Fund account from which ICNU is seeking the Issue Fund Grant and Available Funds:

ICNU proposes a total budget of \$62,500 and is seeking an Issue Fund Grant in the amount of \$50,000. ICNU estimates that the amount currently available in the PGE Issue Fund Account for 2018 is \$123,750.

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

Attached as Exhibit A is ICNU's proposed budget in UE 335.

(6) Matching Funds

As required by Article 6.3(g) of the IFA, ICNU represents that it will use matching fund resources 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 \$50,000, based on the following considerations:

1. This proceeding will be dedicated to revising the rates PGE charges its customers, including ICNU's members. Any such revision to PGE's rates may significantly impact ICNU's members and warrants considerable scrutiny. In addition, the case raises important questions of policy and fact.

2. ICNU represents the interests of industrial customers and has significant experience participating in Commission proceedings involving the Commission and PGE. In addition, ICNU has participated in numerous previous cases related to setting rates for PGE. Thus, ICNU possesses significant interest and expertise with respect to this proceeding. ICNU's participation will benefit all PGE industrial and large non-residential customers.

3. ICNU has been precertified under Articles 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 26th day of February, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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Of Attorneys for Industrial Customers
of Northwest Utilities

UE 335

Exhibit A

ICNU Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	106	\$280	\$29,680
Attorney	44	\$225	\$9,900
Paralegal	15	\$170	\$2,550
<i>Expert Witness Fees</i>			
Expert 1	100	\$200	\$20,000
<i>Other Expenses</i>			
Travel			\$220
Printing and Postage			\$150
Subtotal			\$62,500
20% of ICNU Funded Expenditures			\$12,500
Total ICNU PGE Issue Fund Grant Proposed Budget			\$50,000
Total ICNU Issue Fund Request			\$50,000