

# Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com  
Suite 400  
333 S.W. Taylor  
Portland, OR 97204

January 10, 2018

*Via Electronic Mail and Federal Express*

Public Utility Commission of Oregon  
Attn: Filing Center  
3930 Fairview Industrial Drive SE  
Salem OR 97302

Re: In the Matter of PACIFICORP  
Multi-State Process ("MSP") Intervenor Funding Agreement  
**Docket No. UM 1586**

Dear Filing Center:

Enclosed please find the Request for Final Payment of MSP Fund Grant and Confidential Exhibit A on behalf of the Industrial Customers of Northwest Utilities. Pursuant to Section 6.1 of the MSP Intervenor Funding Agreement, Confidential Exhibit A is being submitted under seal to the Commission and PacifiCorp.

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  
cc: Etta Lockey  
(via U.S. Mail)

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1586**

In the Matter of	)	
	)	
PACIFICORP	)	REQUEST FOR FINAL PAYMENT OF
	)	MSP FUND GRANT OF THE
Multi-State Process Intervenor Funding	)	INDUSTRIAL CUSTOMERS OF
Agreement.	)	NORTHWEST UTILITIES
_____	)	

Pursuant to Section 6.1 of the Multi-State Process (“MSP”) Second Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) by Order No. 17-028, the Industrial Customers of Northwest Utilities (“ICNU”) hereby requests final payment of ICNU’s MSP Fund Grant in Docket No. UM 1586 in the amount of \$25,165.03.

On February 17, 2017, ICNU filed a Request for MSP Fund Grant and Proposed Budget in Docket No. UM 1586 in the amount of \$65,000. On February 22, 2017, the Commission approved an MSP Fund Grant for ICNU in the amount of \$65,000 by Order No. 17-067. ICNU filed a Request for Partial Payment of MSP Fund Grant on August 28, 2017, in the amount of \$36,547.38, which the Commission approved by Order No. 17-333. At this time, ICNU requests final payment of its approved MSP Fund Grant in Docket No. UM 1586 in the amount of \$25,165.03, and requests that the remaining \$3,287.59 of its approved MSP Fund Grant be released back into the ICNU MSP Fund. ICNU’s expenses are shown in Confidential Exhibit A.

This Request for Final Payment satisfies the requirements of the MSP IFA as follows:

**Section 6.1(a)** – The itemized expenses, payees, and hourly rates are attached as Confidential Exhibit A.

**Section 6.1(b)** – ICNU has been an active participant in this Docket. ICNU has participated in all meetings and conducted technical analysis of the appropriate interstate cost allocation methodology for PacifiCorp. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU’s participation in UM 1586.

**Section 6.1(c)** – The Commission approved ICNU’s proposed budget on February 22, 2017. In addition, ICNU used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.1 of the MSP IFA.

**Section 6.2** – All of the expenses included in Exhibit A are Eligible Expenses as defined in Section 6.2 of the MSP IFA because they relate to services provided or expenses incurred by ICNU’s outside legal counsel and expert witness. Relevant non-privileged documents substantiating the Eligible Expenses in Confidential Exhibit A are available for Commission audit, if requested, pursuant to Section 6.8 of the MSP IFA.

The MSP IFA provides that “the Commission will authorize reimbursement of Eligible Expenses upon satisfaction of any conditions imposed on the MSP Fund Grant and the requirements set forth in Article 6 and Article 7 [of the MSP IFA].” MSP IFA § 5.3. Likewise, the intervenor funding rules adopted by the Commission provide that “[t]he terms of an [intervenor funding] agreement are 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 MSP IFA and respectfully requests that the Commission approve final payment of ICNU’s MSP Fund Grant in the amount of \$25,165.03 within 30 days of receiving this Request for Final Payment, as provided in Section 6.4 of the MSP IFA.

Payment should be sent to:

Industrial Customers of Northwest Utilities  
c/o S. Bradley Van Cleve  
Davison Van Cleve, P.C.  
333 SW Taylor, Suite 400  
Portland, OR 97204

Dated this 10th day of January, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 (telephone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Of Attorneys for Industrial Customers  
of Northwest Utilities