

Davison Van Cleve PC

Attorneys at Law

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

September 24, 2015

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: PUBLIC UTILITY COMMISSION OF OREGON
Investigation into Large Customer Energy Efficiency Limitations
Docket No. UM 1713

Dear Filing Center:

Enclosed for filing in the above-captioned proceeding, please find the Request for Final Payment of Issue Fund Grant and Confidential Exhibit A on behalf of the Industrial Customers of Northwest Utilities.

Pursuant to Section 7.3 of the Intervenor Funding Agreement, Confidential Exhibit A is being submitted in a separate sealed envelope to the Commission, PacifiCorp, and Portland General Electric.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1713

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	REQUEST FOR FINAL PAYMENT OF
OREGON)	ISSUE FUND GRANT OF THE
)	INDUSTRIAL CUSTOMERS OF
Investigation into Large Customer Energy)	NORTHWEST UTILITIES
Efficiency Limitations)	
)	

Pursuant to Section 7.3 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”) hereby requests final payment of ICNU’s Issue Fund Grant in Docket No. UM 1713 in the amount of \$15,000. Since the Issue Fund Grant is being split between the PacifiCorp and Portland General Electric (“PGE”) Issue Funds, ICNU requests payment of \$11,000 from PacifiCorp’s Issue Fund and \$4,000 from PGE’s Issue Fund.

On April 15, 2015, ICNU filed a Proposed Budget for an Issue Fund Grant in Docket No. UM 1713 in the amount of \$15,000. On April 20, 2015, the Commission issued Order No. 15-131, approving an Issue Fund Grant for ICNU in the amount of \$15,000, with \$11,000 to be drawn from the PacifiCorp Issue Fund and \$4,000 from the PGE Issue Fund. At this time, ICNU requests final payment of the approved Issue Fund Grant in Docket No. UM 1713.

ICNU hereby requests that the Commission authorize final payment of the Issue Fund Grant in the amount of \$15,000. ICNU's expenses are shown in Confidential Attachment A.

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 has been an active participant in this Docket. ICNU has conducted discovery, participated in workshops, attended a settlement conference, and filed comments. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU's participation in UM 1713.

Section 7.3(c) – The Commission approved ICNU's proposed budget on April 20, 2015. In addition, ICNU used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA.

Section 7.3(d) - This Request for Payment constitutes a Final Request for Payment in this Docket.

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 “[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 IFA and respectfully requests that the Commission approve final payment of ICNU's Issue Fund Grant in the amount of \$11,000

from the PacifiCorp Issue Fund and \$4,000 from the PGE Issue Fund within 30 days of receiving this Request for Final Payment as provided in Section 7.6 of the 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 24th day of September, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve
S. Bradley Van Cleve
333 S.W. Taylor, Suite 400
Portland, Oregon 97204
(503) 241-7242 telephone
(503) 241-8160 facsimile
bvc@dvclaw.com
Of Attorneys for Industrial Customers
of Northwest Utilities