

# Davison Van Cleve PC

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October 24, 2017

***Via Electronic Filing and Federal Express***

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

Re: In the Matter of PACIFICORP, dba PACIFIC POWER  
Application for Transportation Electrification Programs.  
**Docket No. UM 1810**

Dear Filing Center:

Enclosed please find the Request for Final Payment and Reallocation of Issue Fund Grant, along with 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 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

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1810**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER	)	REQUEST FOR FINAL PAYMENT
	)	AND REALLOCATION OF ISSUE
Application for Transportation Electrification	)	FUND GRANT OF THE
Programs.	)	INDUSTRIAL CUSTOMERS OF
_____	)	NORTHWEST UTILITIES

Pursuant to Section 7.3 of the Third Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) by Order No. 15-335 (October 20, 2015), the Industrial Customers of Northwest Utilities (“ICNU”) hereby requests final payment of ICNU’s Issue Fund Grant in Docket No. UM 1810 in the amount of \$14,313.74.

On February 24, 2017, ICNU filed a Request for Issue Fund Grant and Proposed Budget in Docket No. UM 1810, showing eligible expenses in the amount of \$28,700 and requesting an Issue Fund Grant in the amount of \$22,960. On February 28, 2017, the Commission issued Order No. 17-073, approving an Issue Fund Grant for ICNU in the amount of \$22,960. At this time, ICNU requests that the Commission authorize final payment of the approved Issue Fund Grant in Docket No. UM 1810 in the amount of \$14,313.74 from the 2017 PacifiCorp Issue Fund. As described below, ICNU requests that the unused portion of its UM 1810 Issue Fund Grant be reallocated to Docket No. UE 323 for use in that proceeding. ICNU’s expenses are shown in Confidential Exhibit 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, undertaken research, and participated in settlement conferences, in addition to filing testimony. The expenses included in Confidential Exhibit A are reasonable and directly attributable to ICNU’s participation in this Docket.

**Section 7.3(c)** – The Commission approved ICNU’s proposed budget on February 28, 2017. 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 \$14,313.74 from the 2017 PacifiCorp Issue Fund within 30 days of receiving this Request for Final Payment, as provided in Section 7.6 of the IFA.

Pursuant to Section 6.7 of the IFA, ICNU respectfully requests that the Commission reallocate the remaining \$8,646.26 of the Issue Fund Grant in this proceeding to Docket No. UE 323. ICNU is concurrently filing its Request for Amendment of Proposed Budget in Docket No. UE 323.

Upon payment of this Request for Final Payment and Reallocation of Issue Fund Grant, the balance of the UM 1810 Issue Fund Grant will be zero, and the balance of ICNU's Amended Proposed Budget in Docket No. UE 323 will be \$28,646.26.<sup>1/</sup>

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 October, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*/s/ Jesse E. Cowell*

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<sup>1/</sup> This amount assumes the Commission also grants ICNU's Request for Amendment of Proposed Budget in Docket No. UE 323.