

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 399 & UM 2114

In the Matter of	)	
	)	
PACIFICORP, d.b.a. PACIFIC POWER	)	REPLY TO AWEC AND CUB
Request for a General Rate Revision	)	OF SMALL BUSINESS
and	)	UTILITY ADVOCATES
Investigation Into The Effects of the	)	
COVID-19 Pandemic on Utility	)	
Customers	)	

**1. INTRODUCTION**

Pursuant to OAR 860-001-0420(5), Small Business Utility Advocates (“SBUA”), to file this Reply to the Response of Alliance of Western Energy Consumers (“AWEC”) and Oregon Citizens’ Utility Board (“CUB”) opposing SBUA’s Motion for Reallocation of Issue Funds. SBUA’s Motion references both the Fourth and the Fifth Amended and Restated Intervenor Funding Agreements.

**2. ARGUMENT**

SBUA is seeking to recover funds regarding UM 2114 related costs and including costs from 2021 when SBUA labored extensively with an expert to ensure fairness and reasonableness of this process and costs.

SBUA participated in the UE 399 rate case and that rate case continued into 2023. SBUA did not drop out of that rate case, and was required to review further to confirm its position regarding the content of the Fourth Stipulation.

As to the argument that nothing in UM 2114 occurred in 2023, it is abundantly clear that the costs of the programs put in place by the stipulation approved in UM 2114 were negotiated in different dockets for different utilities in 2023. Providing more detail here as an example, in the PGE Advice No. 22-45, Schedule 152 Major Event Cost Recovery 2474. “PGE submitted a Supplemental Filing on March 7, 2023 to update the allocation methodology and amortization period to the terms that parties agreed upon during a workshop.” The docket clearly concerns UM 2114 and SBUA clearly participated in this process<sup>1</sup> even though the docket sheet omits SBUA’s participation but includes reference to AWEC and CUB.<sup>2</sup>

For these reasons it is entirely reasonable that SBUA recover UM 2114 funds in 2023.

### 3. CONCLUSION

For the foregoing reasons, SBUA asks the Commission to grant the Motion.

Respectfully submitted: September 29, 2023.

s/ Diane Henkels

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Diane Henkels  
Attorney, Small Business Utility Advocates  
www.utilityadvocates.org  
621 SW Morrison St. Ste 1025  
Portland, OR 97205  
541-270-6001  
diane@utilityadvocates.org

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<sup>1</sup> ADV 1474 PGE ADVICE NO. 22-45 SCHEDULE 152 MAJOR EVENT COST RECOVERY (“The purpose of this filing is to request Commission approval of a revision of PGE Schedule 152 to enable timely recovery of costs incurred related to the COVID-19 Emergency.”) <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=23564> (Last accessed: 9/25/23.) See Docket No. ADV 1474/Advice No. 22-45 March 14, 2023 <https://edocs.puc.state.or.us/efdocs/UBF/adv1474ubf10542.pdf> p3.

<sup>2</sup> <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=23564> (Last accessed 9/25/23).