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September 30, 2019

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 COMPANY,
2019 Integrated Resource Plan
Docket No. LC 73

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' **Notice of Intent to Request Issue Fund Grant and Request for Issue Fund Grant and Proposed Budget** 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

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 73

In the Matter of)	NOTICE OF INTENT TO REQUEST
)	ISSUE FUND GRANT and REQUEST
PORTLAND GENERAL ELECTRIC)	FOR ISSUE FUND GRANT AND
COMPANY,)	PROPOSED BUDGET OF THE
)	ALLIANCE OF WESTERN ENERGY
2019 Integrated Resource Plan.)	CONSUMERS
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The Alliance of Western Energy Consumers (“AWEC”) files this Notice of Intent to Request an Issue Fund Grant in Docket No. LC 73, 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. 18-020 (January 17, 2018).

1. On May 21, 2019, the Commission issued a Notice of Prehearing Conference for Portland General Electric Company’s (“PGE” or the “Company”) 2019 Integrated Resource Plan (“IRP”). The Commission docketed the filing as LC 73. PGE subsequently filed its 2019 IRP on July 19, 2019.

2. LC 73 is an Eligible Proceeding for Issue Funds under the IFA. IFA, Article 1(c)(iii). Accordingly, an Issue Fund Grant may be made for this proceeding under Article 6.1 the IFA.

3. Article 6.3 of the IFA requires AWEC to submit a proposed budget within 30 days of the prehearing conference at which the schedule for a proceeding is established or by such other date as the Commission designates. At the time of the prehearing conference, AWEC

had fully allocated issue funds to other PGE matters (UE 358 and UE 359) and, therefore, had no budget to submit. As noted below, AWEC now seeks to reallocate funds from UE 359 to this Eligible Proceeding and, therefore, respectfully requests a waiver of this requirement.

4. 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 LC 73.

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

6. AWEC 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, AWEC files this Proposed Budget in Docket No. LC 73 for an Issue Fund Grant in the amount of \$10,000. If additional PGE Issue Funds become available, AWEC reserves the right to file an amended proposed budget and request an additional Issue Fund Grant. AWEC proposes that this grant be drawn from the remaining funds in AWEC's approved Issue Fund Grant in Docket No. UE 359. AWEC is concurrently filing a request for reallocation of \$10,000 from Docket No. UE 359 to this proceeding. AWEC 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 AWEC for which AWEC is seeking the Issue Fund Grant:

AWEC has retained Davison Van Cleve, P.C. to represent it in LC 73. AWEC will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in LC 73, and plans to conduct discovery in this proceeding. In addition, AWEC 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 AWEC:

AWEC intends to investigate numerous aspects of PGE's 2019 IRP, including PGE's Action Plan, its proposal to plan for direct access load, its proposal to acquire additional renewable resources, and any other issues identified by other parties or through discovery.

(3) Description of the particular customer class or classes that will benefit from the intervenor's participation:

AWEC's participation will directly benefit large energy consumers, as well as all other large non-residential customers of PGE.

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

AWEC proposes a total budget of \$12,500 and is seeking an Issue Fund Grant in the amount of \$10,000. As stated above, AWEC is proposing that this amount be reallocated from AWEC's approved Issue Fund Grant in UE 359 for use in this proceeding.

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

Attached as Exhibit A is AWEC's proposed budget in LC 73.

(6) Matching Funds

As required by Article 6.3(g) of the IFA, AWEC 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 AWEC is seeking an Issue Fund Grant.

Basis for Request

AWEC respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$10,000, based on the following considerations:

1. The Company's analysis of its future load and regulatory obligations, along with its proposed plan of action over the next two to four years, may have a direct bearing on the rates paid by AWEC's members. In addition, the case raises important questions of policy and fact.
2. AWEC represents the interests of large energy consumers and has significant experience participating in Commission proceedings involving the Commission and PGE. In addition, AWEC has participated in numerous previous cases related to setting rates for PGE. Thus, AWEC possesses significant interest and expertise with respect to this proceeding. AWEC's participation will benefit all PGE industrial and large non-residential customers.
3. AWEC 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, AWEC respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount specified above.

Dated this 30th day of September, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

LC 73

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	14	\$280	\$3,920
Attorney	10	\$225	\$2,250
Paralegal	10	\$170	\$1,700
<i>Expert Witness Fees</i>			
Expert	20	\$224	\$4,480
<i>Other Expenses</i>			
Travel			\$100
Printing and Postage			\$50
Subtotal			\$12,500
20% of AWEC Funded Expenditures			\$2,500
Total AWEC-PGE Issue Fund Grant Proposed Budget			\$10,000
Total AWEC Issue Fund Request			\$10,000