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September 7, 2023

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,
2023 Clean Energy Plan and Integrated Resource Plan.
Docket No. LC 80

Dear Filing Center:

Enclosed please find the Request for Final Payment and Reallocation of Issue Fund Grant and Confidential Exhibit A on behalf of the Alliance of Western Energy Consumers. Confidential Exhibit A will be transmitted electronically to the Commission and Portland General Electric Company and will be encrypted with 7-zip software.

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: Erin Apperson

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 80

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	REQUEST FOR FINAL PAYMENT
COMPANY,)	AND REALLOCATION OF ISSUE
)	FUND GRANT OF THE ALLIANCE OF
2023 Clean Energy Plan and Integrated)	WESTERN ENERGY CONSUMERS
Resource Plan.)	
_____)	

Pursuant to Section 7.3 of the Fifth Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) in Order No. 22-506 (Dec. 29, 2022), the Alliance of Western Energy Consumers (“AWEC”) hereby requests final payment of AWEC’s Issue Fund Grant in Docket No. LC 80 in the amount of \$19,228.16.

On April 18, 2023, AWEC filed a Proposed Budget and Request for Issue Fund Grant in Docket No. LC 80 in the amount of \$44,909. On April 21, 2023, the Commission approved an Issue Fund Grant for AWEC in the amount of \$44,909 by Order No. 23-149. At this time, AWEC requests that the Commission authorize final payment of AWEC’s Issue Fund Grant in Docket No. LC 80 in the amount of \$19,228.16 from the 2023 PGE Issue Fund. AWEC’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) – AWEC has been an active participant in this Docket. AWEC reviewed the filings in this docket, conducted discovery, and filed comments in this Docket. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC’s participation in LC 80.

Section 7.3(c) – The Commission approved AWEC’s proposed budget on April 21, 2023. In addition, AWEC 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 AWEC’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). AWEC has satisfied the terms of the IFA and respectfully requests that the Commission approve final payment of AWEC’s Issue Fund Grant in the amount of \$19,228.16 in the manner described above within 30 days of receiving this Request for Final Payment, as provided in Article 7.6 of the IFA.

Pursuant to Article 6.7 of the IFA, AWEC respectfully requests that the Commission reallocate the remaining \$25,680.84 in AWEC’s approved Issue Fund Grant in this proceeding to Docket No. UE 416. AWEC is concurrently filing a Request for Amendment of

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Proposed Budget along with a Request for Final Payment of Issue Fund Grant in Docket No. UE 416.

Upon payment of this Request for Final Payment and Reallocation of Issue Fund Grant, the balance of AWEC's LC 80 Issue Fund Grant will be zero, and the balance of AWEC's approved Issue Fund Grant in Docket No. UE 416 will be \$75,680.84.¹

Checks should be made payable to:

Alliance of Western Energy Consumers

Payment should be sent to:

Alliance of Western Energy Consumers
c/o Tyler C. Pepple
Davison Van Cleve, P.C.
107 SE Washington St., Suite 430
Portland, OR 97214

¹ This amount assumes the Commission grants AWEC's concurrently filed Request for Amendment of Proposed Budget in Docket No. UE 416.

Dated this 7th day of September, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

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