

# Davison Van Cleve PC

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April 18, 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:

Please find enclosed the Alliance of Western Energy Consumers' Proposed Budget and Request for Issue Fund Grant in the above-referenced docket.

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

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 80**

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

Pursuant to Article 6.3 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”) files this Proposed Budget in Docket No. LC 80 (the “Proceeding”) and Request for an Issue Fund Grant in the amount of \$44,909 from the 2023 Portland General Electric (“PGE”) Issue Fund. 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 respectfully requests that the Commission make its best efforts to 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 80. AWEC

will attend all clarifying sessions, workshops, public meetings, oral presentations, and hearings in LC 80, 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 Clean Energy Plan and Integrated Resource Plan, including the utility's proposed resource procurement, its market price forecasts, its load forecast, its resource modeling, and any other issues identified during discovery. In addition, AWEC will review any other issues raised by PGE's filing or by other parties.

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

AWEC's participation will directly benefit industrial customers, 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 \$56,136.25 and is seeking an Issue Fund Grant in the amount of \$44,909. AWEC estimates that the amount currently available in the PGE Issue Fund Account for 2023 is \$44,909.

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

Attached as Exhibit A is AWEC's proposed budget in LC 80.

**(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. AWEC's proposed budget assumes a fully litigated case. If the case is settled prior to hearing, actual expenses could be lower.

**Basis for Request**

AWEC respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$44,909, based on the following considerations:

1. Any changes to PGE's rates as a result of these proceedings could substantially impact the rates PGE charges its customers, including AWEC's members, and warrants considerable scrutiny. 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 18th day of April, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Corinne O. Olson

Corinne O. Olson

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Of Attorneys for the

Alliance of Western Energy Consumers

LC 80

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Partner	5	\$325	\$1,625
Senior Attorney	45	\$300	\$13,500
Junior Attorney	45	\$275	\$12,375
Paralegal / Law Clerk	20	\$200	\$4,000
<i>Expert Witness Fees</i>			
Expert	100	\$244	\$24,400
<i>Other Expenses</i>			
Travel			\$161.25
Printing and Postage			\$75
Subtotal			\$56,136.25
20% of AWEC-Funded Expenditures			\$11,227.25
<b>Total AWEC-PGE Issue Fund Grant Proposed Budget</b>			<b>\$44,909</b>
<b>Total AWEC Issue Fund Request</b>			<b>\$44,909</b>