

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 80**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	CUB REQUEST FOR AN ISSUE
COMPANY,	)	FUND GRANT & PROPOSED
	)	BUDGET
	)	
	)	
2023 Integrated Resource Plan / Clean	)	
<u>Energy Plan.</u>	)	

The Oregon Citizens' Utility Board (“CUB”) requests a grant of \$24,000 from the 2023 Portland General Electric Issue Fund. CUB has been tracking its participation in this docket by hours and activity.

CUB is pre-certified per OAR 860-012-0100(3)(a). LC 80 is an eligible proceeding under the Fifth Amended and Restated Intervenor Funding Agreement (“IFA”), as approved by the Oregon Public Utility Commission in Order No. 18-017, entered January 29, 2022. The proceeding directly affects Portland General Electric, which is a participating public utility under the IFA. *See* IFA at Article 1(n). The IFA defines an Eligible Proceeding for Issue Funds as “an Integrated Resource Plan,” IFA, Article 1(c)(iii). LC 80 is Portland General Electric’s Integrated Resource Plan; thus, an Issue Fund Grant may be made for this proceeding under Article 6.1 of the IFA.

Article 6.2 of the IFA requires an intervenor seeking and Issue Fund Grant to file a Notice of Intent to Request and Issue Fund Grant. CUB filed its Notice of Intent to Request an Issue Fund Grant on March 9<sup>th</sup>, 2023, as required by the IFA (Article 6.2).

Article 6.3 of the IFA requires an intervenor seeking and Issue Fund Grant to file a

proposed budget within 30 days after the prehearing conference at which the schedule for the proceeding is established.

Pursuant to paragraph 6.3 of the IFA, the proposed budget must identify certain points of information. CUB provides the information below.

*(a) Statement of Work to Be Performed:* CUB intends to participate in every procedural aspect of this case. CUB will participate in the prehearing conference and will participate in all workshops and settlement meetings. CUB will also attend and participate in the hearing scheduled for this docket. CUB will review and analyze the testimony filed in this docket and will review the briefs yet to be filed. We will pursue discovery of Portland General Electric through data requests and we will respond to data requests asked of us. We will file testimony and briefs.

*(b) Description of Areas to Be Investigated:* CUB is investigating issues including, but not limited to:

- i. Preferred Portfolio and Action Plan;
- ii. Analysis of Risk Associated with each Portfolio;
- iii. PGE's Capacity Needs;
- iv. PGE's plan for HB 2021 Compliance, and;
- v. Issues Raised by Other Parties.

*(c) Description of the Class or Classes Benefiting from CUB's Participation:*

CUB represents the interests of Portland General Electric's residential customers, though other customer classes may benefit from many aspects of our participation.

*(d) The Fund from Which CUB Seeks an Issue Fund Grant & Available Funds:* CUB is seeking a \$24,000 grant from the 2023 Portland General Electric Issue Fund. CUB respectfully

requests that the Commission approve CUB's request for a \$24,000 grant from the 2023 Portland General Electric Issue Fund.

*(e) The Budget Showing Estimated Fees and Costs:* CUB's budget accompanies this document as Attachment A.

*(f) A Representation of the Use of Matching Funds:* The budget and an accounting for the use of matching funds accompany this document as Attachment A.

Dated this 9<sup>th</sup> day of March, 2023.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael P. Goetz".

Michael P. Goetz, OSB #141465  
General Counsel  
Oregon Citizens' Utility Board  
610 SW Broadway, Ste. 400  
Portland, OR 97205  
T. 503.227.1984  
E. [mike@oregoncub.org](mailto:mike@oregoncub.org)

## Attachment A

### CUB Proposed Budget -- LC 80

<b>CUB Internal Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
<i>Staff</i>			
Bob Jenks, Executive Director	\$350	10.00	\$3,500.00
Michael Goetz, General Counsel	\$325	15.00	\$4,875.00
Jennifer Hill-Hart, Policy Manager	\$325	20.00	\$6,500.00
Thomas Jerin, Office Manager	\$180	8.50	\$1,530.00
Will Gehrke, Senior Economist	\$300	15.00	\$4,500.00
John Garrett, Economist	\$275	20.00	\$5,500.00
Law Clerk	\$180	20.00	\$3,600.00
<i>Other Expenses</i>			
Travel			
<b>SubTotal</b>			\$30,005.00
<hr/>			
<b>In-House Resources</b>			
20% of Eligible Expenses			\$6,001
<b>Total</b>			<b>\$24,004</b>