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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,
2020 Annual Power Cost Update Tariff (Schedule 125).
Docket No. UE 359

Dear Filing Center:

Enclosed please find the Request for Final Payment and Reallocation of Issue Fund Grant on behalf of the Alliance of Western Energy Consumers in the above-referenced docket. Pursuant to Section 7.3 of the Intervenor Funding Agreement, Confidential Exhibit A is being submitted in a separate sealed envelope to the Commission and PGE.

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: Jay Tinker

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 359

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	REQUEST FOR FINAL PAYMENT
COMPANY,)	AND REALLOCATION OF ISSUE
)	FUND GRANT OF THE ALLIANCE OF
)	WESTERN ENERGY CONSUMERS
2020 Annual Power Cost Update Tariff)	
(Schedule 125).)	
_____)	

Pursuant to Section 7.3 of the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) in Order No. 18-017 (January 17, 2018), the Alliance of Western Energy Consumers (“AWEC”) hereby requests final payment of AWEC’s Issue Fund Grant in Docket No. UE 359 in the amount of \$33,492.45.

On April 8, 2019, AWEC filed a Request for Issue Fund Grant and Proposed Budget in Docket No. UE 359, showing eligible expenses in the amount of \$62,500 and requesting an Issue Fund Grant in the amount of \$50,000. On April 11, 2019, the Commission issued Order No. 19-123, approving an Issue Fund Grant for AWEC in the amount of \$50,000. At this time, AWEC requests that the Commission authorize final payment of AWEC’s approved Issue Fund Grant in Docket No. UE 359 in the amount of \$33,492.45 from the 2019 Portland General Electric Company (“PGE”) Issue Fund. AWEC’s expenses are shown in Confidential Exhibit A.

PAGE 1 – AWEC REQUEST FOR FINAL PAYMENT AND REALLOCATION OF ISSUE FUND GRANT

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 was an active participant in this Docket. AWEC reviewed the filings in this docket, filed testimony, and attended settlement discussions. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC’s participation in UE 359

Section 7.3(c) – The Commission approved AWEC’s proposed budget on April 11, 2019. 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 \$34,316.32 from the 2019 PacifiCorp Issue Fund within 30 days of receiving this Request for Final Payment, as provided in Article 7.6 of the IFA.

PAGE 2 – AWEC REQUEST FOR FINAL PAYMENT AND REALLOCATION OF ISSUE FUND GRANT

Pursuant to Article 6.7 of the IFA, AWEC respectfully requests that the Commission reallocate the remaining \$16,507.55 of AWEC's approved Issue Fund Grant in this proceeding as follows: 1) AWEC requests that \$10,000 of its remaining Issue Fund Grant be reallocated to Docket No. LC 73; and 2) AWEC requests that \$6,507.55 of its remaining Issue Fund Grant be reallocated to Docket No. UE 358. AWEC is concurrently filing its Request for Issue Fund Grant and Proposed Budget in Docket No. LC 70, along with a Request for Amendment to its Proposed Budget in Docket No. UE 358.

Upon payment of this Request for Final Payment and Reallocation of Issue Fund Grant, the balance of AWEC's UE 359 Issue Fund Grant will be zero; the balance of AWEC's Proposed Budget in Docket No. LC 73 will be \$10,000; and the balance of AWEC's Proposed Budget in Docket No. UE 358 will be 28,507.55^{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.
1750 SW Harbor Way, Suite 450
Portland, OR 97201

^{1/} This amount assumes 1) the Commission grants AWEC's Request for Issue Fund Grant and Proposed Budget in Docket No. LC 73, and 2) the Commission grants AWEC's Request for Amendment of Proposed Budget in Docket No. UE 358.

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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