

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com
Suite 450
1750 SW Harbor Way
Portland, OR 97201

April 14, 2020

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,
2021 Annual Power Cost Update
Docket No. UE 377

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Proposed Budget for Issue Fund Grant 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**

UE 377

| | | |
|---------------------------------------|---|-------------------------------|
| In the Matter of |) | |
| |) | |
| PORTLAND GENERAL ELECTRIC |) | PROPOSED BUDGET FOR ISSUE |
| COMPANY, |) | FUND GRANT OF THE ALLIANCE OF |
| |) | WESTERN ENERGY CONSUMERS |
| 2021 Annual Power Cost Update Tariff. |) | |
| _____ |) | |

Pursuant to Article 6.3 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 files this Proposed Budget for Issue Fund Grant in Docket No. UE 377 and (the “Proceeding”), seeking an Issue Fund Grant in the amount of \$30,000. 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 Docket No. 377. AWEC will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in UE 377, 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 Proceeding.

(2) Description of the areas to be investigated by AWEC:

AWEC intends to investigate numerous aspects of PGE's Annual Power Cost Update Tariff, including PGE's power costs, transmission costs, participation in the Western Energy Imbalance Market, and any other issues identified during 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 \$37,500 and is seeking an Issue Fund Grant in the amount of \$30,000 from the 2020 PGE Issue Fund. AWEC estimates that the current balance of the 2020 PGE Issue Fund is \$123,332.

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

Attached as Exhibit A is AWEC's proposed budget in UE 377.

(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 \$30,000, based on the following considerations:

1. PGE's proposed Annual Power Cost Update Tariff may have a direct bearing on the rates paid by AWEC's members who purchase power from PGE. 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 14th day of April, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

1750 SW Harbor Way, Suite 450

Portland, OR 97201

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Of Attorneys for the

Alliance of Western Energy Consumers

UE 377

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

| Personnel | Hours | Rate | Cost |
|--|-------|-------|-----------------|
| <i>Attorney Fees</i> | | | |
| Senior Attorney | 45 | \$300 | \$13,500 |
| Attorney | 30 | \$245 | \$7,350 |
| Paralegal | 10 | \$170 | \$1,700 |
| <i>Expert Witness Fees</i> | | | |
| Expert | 65 | \$224 | \$14,560 |
| <i>Other Expenses</i> | | | |
| Travel | | | \$270 |
| Printing and Postage | | | \$120 |
| Subtotal | | | \$37,500 |
| 20% of AWEC Funded Expenditures | | | \$7,500 |
| Total AWEC-PGE Issue Fund Grant Proposed Budget | | | \$30,000 |
| Total AWEC Issue Fund Request | | | \$30,000 |