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May 3, 2021

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,
2022 Annual Power Cost Update.
Docket No. UE 391

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 call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 391

In the Matter of)	PROPOSED BUDGET AND REQUEST
)	FOR ISSUE FUND GRANT OF THE
PORTLAND GENERAL ELECTRIC)	ALLIANCE OF WESTERN ENERGY
COMPANY,)	CONSUMERS
)	
2022 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”) files this Proposed Budget in Docket No. UE 391 (the “Proceeding”) and Request for an Issue Fund Grant in the amount of \$30,000 from the 2021 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 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 UE 391. AWEC will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in UE 390, 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.

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

AWEC intends to investigate numerous aspects of PGE's Annual Power Cost Update, including PGE's power costs, transmission costs, participation in the Western Energy Imbalance Market, 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 \$37,500 and is seeking an Issue Fund Grant in the amount of \$30,000. AWEC estimates that the amount currently available in the PGE Issue Fund Account for 2021 is \$170,140.

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

Attached as Exhibit A is AWEC's proposed budget in UE 391.

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

1. Any change in PGE's rates 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 3rd day of May, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

UE 391

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	50	\$300	\$15,000
Attorney	41	\$275	\$11,275
Paralegal	12	\$170	\$2,040
<i>Expert Witness Fees</i>			
Expert	40	\$224	\$8,960
<i>Other Expenses</i>			
Travel			\$150
Printing and Postage			\$75
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