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December 16, 2016

Public Utility Commission of Oregon
Filing Center
POB 1088
Salem, OR 97308-1088
Puc.filingcenter@state.or.us

RE: UM 1751 Implementing Energy Storage Program Guidelines pursuant to House
Bill 2193

Attention Filing Center:

Small Business Utility Advocates ("SBUA") submits this Petition to Submit Proposed
Budget for Issue Fund Grant for SBUA in the above-referenced docket.

I am available for any questions.

Sincerely,

Diane Henkels
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Counsel for SBUA
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Enclosure

Cc: UM 1751 Service list

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1751

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	PETITION TO SUBMIT PROPOSED
OREGON:)	BUDGET FOR ISSUE FUND GRANT
)	FOR SMALL BUSINESS UTILITY
Implementing Energy Storage Program)	ADVOCATES
Guidelines pursuant to House Bill 2193)	

Pursuant to Section 6.3 of the Third Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) in Order 15-335, Order 16-113, and OAR 860-001-0120, Small Business Utility Advocates (“SBUA”) respectfully submits this Proposed Budget for Issue Fund Grant (“Proposed Budget”) in UM 1751 seeking an Issue Fund Grant in the amount of \$1,794.00. SBUA proposes that this grant be funded from the PacifiCorp Issue Fund Account and the Portland General Electric (“PGE”) Issue Fund Account. The following information is provided in accordance with Section 6.3 of the IFA:

1. Statement of the work performed by SBUA for which SBUA is seeking the Issue Fund Grant:

SBUA has retained Cleantech Law Partners PC to represent SBUA in UM 1751. Counsel for SBUA has attended conferences, public meeting, and prepared comments in UM 1751. SBUA retained an expert witness to review the filing and assist in submitting comments.

2. Description of areas to be investigated by SBUA:

SBUA has investigated and intends to investigate further how the energy storage plan guidelines affect small business, including application to small business of the proposed technologies, opportunities that implementation of the legislation presents to small business,

criteria pertinent to small business to evaluate projects, and the impact that the cost of the energy storage program may have on the rates of small business.

3. Description of the particular customer class that benefit from the intervenor's participation.

SBUA's participation will directly benefit small commercial customers that are ratepayers of Portland General Electric and PacifiCorp d.b.a. Pacific Power, to which HB 2193 applies. HB 2193 (2015), sec. 1.

4. Identification of the specific Fund account from which SBUA is seeking the Issue Fund Grant:

SBUA is seeking an Issue Fund Grant in the amount of \$1,794.00 from either the PacifiCorp Issue Fund Account and the PGE Issue Fund Account or the combination of the two, established under IFA Section 4.2.3. SBUA will bear the cost of its anticipated participation to the extent that costs exceed five hours work over 20% of the work. SBUA estimates that the amount available in the PacifiCorp Issue Fund Account is \$2,239.03. SBUA estimates that the amount available in the PGE Issue Fund Account for 2016 is \$14.85 but as this matter will continue into in 2017, requests funds be advanced from PGE's 2017 available balance, which SBUA estimates to be \$122,764.85.

5. Budget showing estimated attorney and consultant fees and expert witness fees:

Attached as Exhibit A is SBUA's Proposed Budget detailing the hours and hourly rates of SBUA's attorneys and expert in 2016. The Proposed Budget was developed based on work performed and on previous dockets based on review and comment.

6. As required by Section 6.5 of the IFA, SBUA represents that it has used and will use matching funds 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 SBUA is seeking an Issue Fund Grant. SBUA's proposed budget represents work done to date. Having reviewed and commented, SBUA anticipates this proposed budget to be accurate, however, if and as the scope of the docket expands, SBUA would potentially petition to submit a revised or new budget.

Basis for Request

SBUA respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$1,794.00 based on the following considerations:

1. The development of an energy storage program will cause the incremental costs of compliance with renewable standards to rise significantly, all incremental costs are included in the PacifiCorp and PGE rates paid by the SBUA members who are PacifiCorp and PGE customers, and small commercial is potentially greatly impacted by how PacifiCorp and PGE implement an energy storage plan.

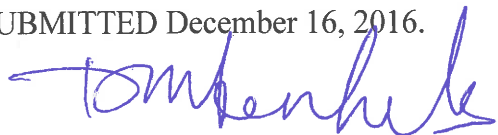
2. SBUA has reviewed the energy storage requirements under HB and the presentations prepared by PacifiCorp and PGE on the guidelines.

3. SBUA represents the interests of small business customers and has experience participating in Commission proceedings involving PacifiCorp and PGE. SBUA's participation will benefit PacifiCorp and PGE small business customers and other classes of customers.

4. Pursuant to IFA 5.3 and Commission Order 16-113, SBUA's Petition for Case Certification was granted and SBUA became eligible to submit this Proposed Budget for consideration. SBUA submits this request with the understanding that, given further activity in this docket anticipated in 2017 but not yet scheduled, an additional future request and budget would be forthcoming.

Therefore, SBUA respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount of \$1,794.00 for which SBUA submits the attached budget in Exhibit A for consideration.

RESPECTFULLY SUBMITTED December 16, 2016.



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Cleantech Law Partners PC
Counsel for Small Business Utility Advocates

UM 1751**Exhibit A****Small Business Utility Advocates' Proposed Budget
for Issue Fund Grant**

Personnel	Hours	Rate	Cost
Executive Director	2	250	\$500
Sr. Attorney— Public rate	5	\$285	\$1425
Jr. Attorney	2	\$225	\$450
Administrative support	2	\$30	\$60
Expert Witness fees	1.5	\$205	\$308
Costs:	Miles		
Travel	0	\$0.00	\$0
Postage/printing			\$0
Subtotal:	12.5		\$2243
20% SBUA:			\$449
Total SBUA Issue Fund Request:			\$1794