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December 27, 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 Request for Payment in the above-referenced docket pursuant to Section 7.3 of the Third Amended and Restated Intervenor Funding Agreement approved by Order 15-335.

Please contact me with any questions.

I am available for any questions.

Sincerely,

Diane Henkels
Cleantech Law Partners PC
Counsel for SBUA
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tel: 541-270-6001

Enclosure

Cc: Denise Saunders, denise.saunders@pgn.com
Dustin Till, dustin.till@pacificorp.com

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1751**

In the Matter of:)	
)	
UM 1751 Implementing Energy Storage)	REQUEST FOR PAYMENT OF SMALL
Program Guidelines pursuant to House Bill)	BUSINESS UTILITY ADVOCATES
2193)	
)	
)	
)	

Pursuant Section 7.3 of the Third Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Public Utility Commission of Oregon (“Commission”) by Order 15-335 (October 20, 2015), Small Business Utility Advocates (“SBUA”) respectfully requests payment of SBUA’s Issue Fund Grant in Docket No. UM 1751 in the amount of \$2,194.

On 4/14/16 SBUA filed a Petition for Case Certification, and on 7/15/16 in Order 16-266 the Commission granted SBUA’s Petition. On 12/16/2016 SBUA filed a Notice of Intent to Request an Issue Fund Grant along with a Proposed Budget for Issue Fund Grant for \$1,794, then filed an Amended Proposed Budget on 12/22/16 for \$2,194, and on 12/23/16 in Order 16-499 Administrative Law Judge Michael Grant approved SBUA’s proposed budget.

SBUA requests that the Commission authorize payment of the Issue Fund Grant in the amount of \$2,194 and includes Small Business Utility Advocates’ Expenses for Issue Fund Request, attached as Exhibit A.

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 in the budget, Exhibit A.

Section 7.3(b)—SBUA has been an active participant in this docket. SBUA intervened, procured technical input, produced detailed comment. The expenses included in the Exhibit A are reasonable and directly attributable to SBUA’s participation in UM 1751.

Section 7.3(c)—The ALJ approved SBUA’s proposed budget on 12/23/16. In addition, SBUA used its own funds to pay for at least 20% of the Eligible Expenses as required by Sections 6.5 & 7.3(c) of the IFA.

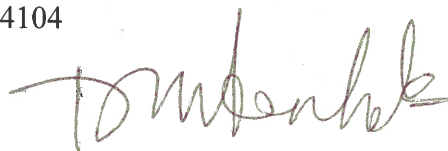
Section 7.3(d)—This Request for Payment constitutes a progress payment in this docket. As expressed in UM 1751 Petition to Submit Proposed Budget for Issue Fund Grant for Small Business Utility Advocates, filed on 12/16/16, an additional future request and budget for this docket would be forthcoming.

Section 7.4—All of the expenses included Exhibit A are Eligible Expenses as defined in Section 7.4 of the IFA because they relate to services provided or expenses incurred by SBUA’s outside legal counsel and expert witnesses. Relevant non-privileged documents substantiating the Eligible Expenses are available for Commission audit, if requested, pursuant to Section 7.10 of the IFA.

The IFA states that the granting of “an Issue Fund Grant shall constitute a binding obligation on the Commission to order reimbursement of Eligible Expenses.” IFA Sec. 6.5. Likewise, the intervenor funding rules adopted by the Commission provide that the “[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 Sec. 860-001-0120(2). SBUA has satisfied the terms of the IFA and respectfully requests that the Commission approve final payment of SBUA’s Issue Fund Grant in the amount of \$2,194 from the 2016 PacifiCorp and Portland General Electric Issue Funds within 30 days of receiving this Request for Payment as provided in Section 7.6 of the IFA.

Payment should be sent to: James Birkelund
Small Business Utility Advocates
548 Market St., #11200
San Francisco, CA 94104

Respectfully submitted. December 27, 2016.



Diane Henkels
Of Counsel, Cleantech Law Partners PC
Small Business Utility Advocates’ Counsel
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UM 1751

Exhibit A

**Small Business Utility Advocates' Expenses for Issue Fund
Payment Request**

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	\$0	\$0
Subtotal:	12.5		\$2743
20% SBUA:			\$549
Total SBUA Issue Fund Payment Request:			\$2194

