

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 416

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	REQUEST FOR EXTENSION
COMPANY)	
)	
Request for a General Rate Revision; and)	
2024 Annual Power Cost Update)	
)	

I. Introduction

Pursuant to OAR 860-001-0700, Small Business Utility Advocates (“SBUA”) requests an extension of up to April 21, 2023 to comply with Chief Administrative Law Judge Moser’s March 10, 2023 Memorandum in this docket (“Memorandum”) regarding target dates of filing for Intervenor Funding Through the Fifth Amended and Restated Intervenor Funding Agreement approved in Order No. 22-506 (“IFA”). SBUA filed a Petition for Intervention and a Notice of Intent to seek Issue Fund Grant on March 7, 2023 and March 8, 2023, respectively.

II. Reasons for the Extension

The reasons for the requested extension is that participation in this and a recent Public Utility Commission (“Commission”) docket with Portland General Electric Company (“Company”)¹, and other dockets², has required more time to plan availability and use of SBUA’s various resources than SBUA had anticipated. These resources, including utility expertise, are substantive to SBUA’s intervention and important to SBUA’s contribution to this rate case on behalf of

¹ Portland General Electric ADV 1474/Advice No. 22-45 PGE COVID-19 Deferral Amortization

² UG 435 Northwest Natural Company Request for General Rate Revision and UE 399 PacifiCorp dba Pacific Power Request for General Rate Revision required follow up and planning pertaining to intervenor funding.

small commercial customers. Availability of utility expertise and supportive financial resources are being finalized. This expertise and resources are essential to supporting SBUA's anticipated Petition for Case Certification.

SBUA anticipates amending filings in the time provided and submitting filings required to seek Issue Funding as set forth in the IFA and on page 5 of the Memorandum, by the deadline of April 21, 2023. SBUA understands that the Memorandum provided for replies to the notice of intent and application for case certification. Memorandum, p5. Accordingly, SBUA commits to confer timely with parties prior to any SBUA filing by the proposed extension deadline possibly to obtain more expeditiously parties' positions.

It is just and reasonable to extend the deadline for SBUA's filing. SBUA has represented small commercial customers recently regarding dockets involving the Company, and also in recent rate cases with other Commission regulated electric and natural gas utilities.³ Small commercial customers are an important customer class and the Commission has found SBUA to substantively contribute on their behalf. Id.

III. Permission to file after 3 p.m.

SBUA acknowledges the filing time set forth in ALJ Lackey's Memorandum February 21, 2023 in this docket and respectfully requests that this Motion for Extension directed toward case certification and access to intervenor funding only and to be determined by the Chief ALJ be accepted as filed although filed shortly after 3 p.m. Alter

//

³ Order 22-161; Order 22-305; Order 22-304, among other examples.

III. Conclusion

For the foregoing reasons, SBUA requests that the Commission grant SBUA's request for extension to file by April 21, 2023 an Amended Petition to Intervene, Amended Notice of Intent, and a Petition for Case Certification along with a Proposed Budget to be reviewed should the Petition for Case Certification be granted.

RESPECTFULLY SUBMITTED April 14, 2023.



s/ Diane Henkels

Diane Henkels
Attorney, Small Business Utility Advocates
www.utilityadvocates.org
621 SW Morrison St. Ste 1025
Portland, OR 97205
541-270-6001
diane@utilityadvocates.org