

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 399 & UM 2114

In the Matter of)	
)	MOTION FOR REALLOCATION
PACIFICORP, d.b.a. PACIFIC POWER)	OF ISSUE FUNDS FOR ISSUE
Request for a General Rate Revision)	FUND GRANT OF SMALL BUSINESS
and)	UTILITY ADVOCATES
Investigation Into The Effects of the)	
COVID-19 Pandemic on Utility)	
Customers)	

I. INTRODUCTION

Comes now, Small Business Utility Advocates (“SBUA”), to submit this Motion for Re-allocation of Issue Funds for Issue Fund Grant of Small Business Utility Advocates (Motion”) pursuant to the Fourth and the Fifth Intervenor Funding Agreement as approved by Orders 18-017 and 22-506, respectively “Fourth IFA” and “Fifth IFA”. SBUA requests that the Commission order:

Payment from funds remaining in PacifiCorp d.b.a. Pacific Power’s 2022 issue funds;

Reallocation of PacifiCorp d.b.a. Pacific Power funds from 2023 to cover remaining balance of SBUA’s budget in 2022 to cover COVID-19 related costs in the UE 399 rate case;

Approval of 2023 case certification funds from PGE to cover the PGE Advice Filing 1474 related budget and PGE portion of SBUA’s other UM 2114 costs COVID-19 included herein in UM 2114 Proposed Amended Budget; and

Approval of 2023 issue funds of Cascade Natural Gas and Avista Utilities to pay SBUA UM 2114 proportional costs.

The UM 2114 Amended Proposed Budget of SBUA is attached herein as Exhibit 1.

II. BACKGROUND

Fourth IFA:

SBUA provides this background to the Fourth IFA and the filings pertaining to intervenor funding in the dockets UE 399 PacifiCorp dba Pacific Power Request for General Rate Revision (“UE 399 PacifiCorp Rate Case”) and UM 2114 (“UM 2114 COVID-19”).

The Fourth IFA provides as follows:

“WHEREAS, the purpose of this Agreement is to make funds available to qualified parties to enable them to advocate on behalf of broad customer interests in proceedings before the Oregon Public Utility Commission (the “Commission”).” Fourth IFA p1, Recitals.

Section 6.7 provides that “An intervenor with approved proposed budgets in multiple dockets may request to reallocate approved amounts between dockets by filing a request in both dockets.” Such a request must identify the previously approved proposed budget amounts, the proposed budget amounts for each docket after reallocation of funds and explain the purpose for the requested reallocation. Any request for reallocation must meet all applicable requirements under Section 6.3 of this Agreement.

The Fifth IFA includes the same language in the same provision. Fourth IFA Sec. 6.7, Fifth IFA Section 6.7.

UE 399 PacifiCorp Rate Case:

PacifiCorp dba Pacific Power filed a Request for General Rate Revision on March 1, 2022. SBUA filed on April 13, 2022 its Petition to Intervene, its notice of intent to seek issue fund grant, and its Petition for Case Certification on April 13, 2022. SBUA filed on April 28,

2022 its Proposed Budget and at the time of this filing information regarding the balance or amount available for issue fund was not available.¹

SBUA filed an Amended Proposed Budget on October 25, 2022, and an Errata on March 24, 2023, and has transmitted confidential filings to the Hearings Division with documentation of SBUA's having met 20% of matching with resources from SBUA in UE 399. The Commission approved the Revised Budget on May 9, 2023 but noted that remaining funds allocated for the year 2022 were \$7,300.

UM 2114:

In August 3, 2022 the Commission granted the UM 2114 Petition for Designation of the docket as Eligible for Intervenor Funding and treated that petition as a Petition for Case Certification. The Commission limited recovery then to \$9000 total over the three dockets UE 399, UG 435, and UM 2114, however, since August 19, 2022, the Commission approved the amended budgets of SBUA in both UE 399 and UG 435. Based on additional information and events since that time, SBUA provides herein a UM 2114 Amended Proposed Budget and confidential filing to demonstrate meeting 20% payment of the Amended Proposed Budget. The Amended Proposed Budget includes work in the docket, except in the UG 435 rate case and the UE 399 rate case. The Amended Proposed Budget includes more recent work through second quarter 2023 where SBUA has continued representing small commercial customers in matters directly related to UM 2114 regarding allocation of COVID-19 pandemic costs in the participating utilities

¹ UE 399 Proposed Budget of SBUA, filed April 28, 2022.

including Portland General Electric, Cascade Natural Gas, Idaho Power Company, and Avista Utilities.²

III. MEMORANDUM

ORS 757.072 was created to strengthen the reliability and credibility of proceedings themselves through funding of activity that supports the building of the case record and the exploration of legal, practical, and policy questions in the context of a pending Commission decision on those topics.³

Given that case certification was granted in UE 399 and also in UM 2114, permitting SBUA to seek intervenor funding in both dockets, the Commission, having already approved the UE 399 Amended Proposed Budget, and SBUA demonstrating grounds for Commission approval of the UM 2114 Amended Proposed Budget and where UM 2114 is docket continuing into 2023, it is fair and reasonable to order a reallocation of funds in these two dockets.

1. IFA Section 6.7 Grounds for Reallocation.

Pursuant to the Fourth and the Fifth IFA section 6.7 an intervenor with approved proposed budgets in multiple dockets may request to reallocate approved amounts between dockets by filing a request in both dockets.

“An intervenor with approved proposed budgets in multiple dockets may request to reallocate approved amounts between dockets by filing a request in both dockets. Such a request must identify the previously approved proposed budget amounts, the proposed budget amounts for each docket after reallocation of funds and explain the purpose for the requested reallocation.

² But not including Northwest Natural Gas Company which was resolved for 2020 and 2021 in the UG 435 rate case.

³ Order 21-103

Any request for reallocation must meet all applicable requirements under Section 6.3 of this Agreement.” Fourth IFA §6.7 and Fifth IFA §6.7.

2. The IFA Section 6.7 Grounds for Reallocation are met in this case.

As demonstrated here below, SBUA’s proposal for reallocation meets the required grounds for reallocation in these dockets.

a) The previously approved budget amounts are as follows:

UE 399: \$22,120, available \$7,311.09 per Order 23-165

UM 2114: \$9000 per Order 22-304; but see attached UM 2114 Amended Proposed Budget Exhibit A \$16,200 (Exhibit 1).

b) The proposed budget amounts for each docket after reallocation of funds and explaining the purpose of the requested allocation:

Proposed budget amounts after reallocation of funds:

UE 399: \$7,300

UM 2114: \$21,762 [$\$4,650^4 + \$2,550^5 + \$5,250^6 + \$1,312^7 + \$500^8 + \$500^9 + \$2,000^{10} + \5000^{11}] - 20%(\$21,762)=\$15,800

⁴ Expert UM 2114 COVID-19

⁵ Expert 1 COVID-19 UE 399

⁶ Expert 2 COVID-19 UE 399

⁷ Expert PGE ADV 1474

⁸ Technical assistant UM 2114 COVID-19

⁹ Law clerk UM 2114 COVID-19

¹⁰ Executive Director UM 2114 COVID-19

¹¹ Attorney COVID-19 PacifiCorp dba Pacific Power UM 2114 & UE 399

Purpose of requested allocation:

The \$7,300¹² is the remainder of the issue funds from 2022 and would be applied to the UE 399 eligible expenses of SBUA in that docket.

The \$15,800 is a sum that includes UM 2114 and related cost recovery matters and reflects the UM 2114 Proposed Amended Budget of SBUA, including eligible costs from participation in UM 2114 2021 to present from participating in COVID-19 program proceedings with other utilities except NW Natural COVID-19 cost allocation, and PacifiCorp d.b.a. Pacific Power COVID-19 cost allocation and work regarding Portland General Electric Advice No. 22-45 Schedule 152 Major Event Cost Recovery Advice Filing ADV 1474.

c) Why this reallocation meets all applicable requirements under IFA Section 6.3:

This reallocation meets the applicable requirements under IFA Section 6.3 where the approved proposed revised budgets of each docket include a statement of work performed by SBUA, a description of the areas to be investigated, a description of the particular customer class that have benefitted from SBUA's participation, the identification of the specific accounts for which SBUA is seeking the issue fund grant and an estimate of the amount of funds in that account, a budget showing the estimated attorney fees, including appropriate support staff and operational support, and estimated expert witness fees, and a representation that the intervenor has used funds in the form of in-house resources or outside funding to account for or pay at least 20% of the Eligible expenses for work to be performed.

¹² \$7311.09 is rounded to \$7,300.

The Commission found in Order 23-165 that the revised budget submitted by SBUA in UE 399 satisfied all of the the conditions above and approved the budget. Currently the 2023 PacifiCorp dba Pacific Power issue fund balance is: \$7,624.09 and Case certified is \$10,000. The Commission also found SBUA had demonstrated payment of the 20% required toward the eligible expenses.

SBUA has submitted prior to this Motion for Reallocation a UM 2114 Proposed Amended Budget of SBUA that reflects the work performed by SBUA through June 2023 with the exception of the work related to COVID-19 cost allocation in the UG 435 Northwest Natural Rate Case. Accounts from which SBUA seeks issue fund grant and their respective issue fund balances including balances of case certification accounts as of July 21, 2023 include PacifiCorp \$7,624 with \$10,000 case certified, Portland General Electric Company (“PGE”) \$718 with \$10,000 case certified, Cascade Natural Gas (“Cascade”) \$39,675 with \$2,500 case certified, and Avista Utilities (“Avista”) case certified \$5,000.¹³ Finally, SBUA provides documentation via confidential filing of meeting the required 20% payment by in-house or outside resources in UM 2114.

d) Why SBUA is seeking recovery for past issues:

Since 2020 SBUA has been advocating for fair and reasonable treatment of small commercial customers with regard to the COVID-19 pandemic impact on utilities and utility customers. SBUA experts and staff have invested substantial resources into this advocacy and have also participated in the proceedings in a way beneficial to all parties with regard to resolving the

¹³ See Intervenor Funding Summary <https://www.oregon.gov/puc/filing-center/pages/intervenor-funding.aspx> (Last accessed 8/25/23).

challenges presented by the pandemic and concurrent rate cases incorporating new demands on utilities. While certain impacts of the pandemic are easing, latent effects are still present including past costs of experts and staff. SBUA seeks to resolve these costs of its intervention and advocacy on behalf of small commercial customers of utilities regarding the COVID-19 pandemic and has complied with required Commission processes to do so.

IV. CONSULTATION

SBUA has provided this Motion substantially the same to the utilities and stakeholders Citizens Utility Board of Oregon (“CUB”) and Alliance of Western Energy Consumers (“AWEC”), PacifiCorp dba Pacific Power on July 27, 2023, and to Portland General Electric Company, Cascade Natural Gas, Avista Utilities, and Northwest Natural on August 28, 2023. PacifiCorp dba Pacific Power and Avista Utilities take no position, CUB opposes, and AWEC opposes the requests to the extent they request funding other than from the Case Certified Account. The other utilities have not responded.

SBUA also sought input on shorter briefing schedule, CUB responded referencing the OAR 860-001-0420 default timing for substantive motions. No other party responded regarding scheduling.

V. CONCLUSION

SBUA requests the Commission grant this Motion for Reallocation of Issue Funds to enable recovery on behalf of small commercial customers amounts in both rate case to the ceiling of the eligible expenses recoverable as expressed in Schedule A of COVID-19 related costs in the

UE 399 rate case¹⁴, case certified funds from PGE ADV 1474 regarding Schedule 152 Major Event Cost Recovery for recovery of costs incurred related to the COVID-19 Emergency, and in addition the eligible expenses incurred in the UM 2114 multiyear docket including allocation as expressed in the UM 2114 Amended Proposed Budget. Granting this Motion and approving the UM 2114 Amended Proposed Budget of SBUA would enable SBUA to move beyond the costs pertaining to the pandemic fairly and reasonably.

Respectfully submitted: September 1, 2023.



s/ Diane Henkels

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¹⁴ This filing includes also the approximately \$7,300 remaining in 2022 PacifiCorp d.b.a. Pacific Power Issue Funds.

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2114

IN THE MATTER OF:)	
)	
INVESTIGATION INTO THE)	AMENDED PROPOSED BUDGET
EFFECTS OF THE COVID-19)	OF SMALL BUSINESS
PANDEMIC ON UTILITY)	UTILITY ADVOCATES
CUSTOMERS)	
_____)	

1. INTRODUCTION

Comes now Small Business Utility Advocates (“SBUA”) to submit this Amended Proposed Budget and Exhibits (“Amended Proposed Budget”) for approval by the Public Utility Commission of Oregon (“Commission”) as consistent with the Fourth Restated and Amended Intervenor Funding Agreement approved by the Commission in Order 18-017 (“Fourth IFA”), and also with the Fifth Restated and Amended Intervenor Funding Agreement approved by the Commission in Order 22-506 approved on December 29, 2022 (“Fifth IFA”).¹ Materials submitted confidentially with this Amended Proposed Budget support the Commission’s finding SBUA has met the requirements as set forth in Order to receive Issue Fund Grant in the amount of the Amended Proposed Budget to assist SBUA in covering expenses incurred in this docket.

This Amended Proposed Budget is filed along with UM 2114 Amended Proposed Budget of SBUA Exhibit A, and UE 399 and UM 2114 Petition for Reallocation of Issue Grant Funds of SBUA.

¹ The Fourth IFA was in effect when the Commission granted SBUA case certification in this docket.

2. BACKGROUND

SBUA incorporates herein the contents of its original UM 2114 Petition for Designation as Eligible Proceeding in the Matter of the Investigation into the Effects of the COVID-19 Pandemic on Utility Customers filed on January 28, 2022 (“Petition”). The Commission granted the SBUA’s Petition on August 19, 2022 in Order 22-304 treating SBUA’s Petition for Designation as an Eligible Proceeding as a Petition for Case Certification. In Order 22-304 the Commission had identified that SBUA could submit a budget up to \$9,000 total for all dockets for 2022.

a) Why SBUA did not file a request for this Amended Proposed Budget sooner:

SBUA did not submit a Request for Payment in UM 2114 because by the time the Commission issued Order 22-304 on August 19, 2022, other UM 2114 related costs had been incurred by SBUA through at least one rate case, and, subsequently through 2022 and the first half of 2023. Also, the Commission subsequently approved revised budgets of SBUA related to those costs in UG 435 and UE 399.

As the following paragraphs demonstrate, UM 2114 related cost deferrals were resolved with regard to NW Natural 2020 and 2021, PacifiCorp dba Pacific Power 2020-2021, Portland General Electric Company 202-2022, and Cascade Natural Gas.

On August 24, 2022, SBUA filed a UG 435 SBUA Amended Proposed Budget, and submitted confirmation on December 12, 2022 that required matching payments were made by SBUA, and on December 30, 2022, in Order 22-507, the Commission approved SBUA’s revised budget in UG 435 Northwest Natural Gas Request for General Rate Revision. That amended proposed budget included resources utilized in negotiating COVID-19 pandemic related costs in

that docket, UG 435. The Northwest Natural Rate Case involved litigation and was resolved as to the 2020 and 2021 COVID-19 deferred costs.²

In Order 23-165, the Commission approved SBUA's revised budget in UE 399 PacificCorp dba Pacific Power Request for General Rate Revision. That revised budget included resources utilized in negotiating the rate case generally and the COVID-19 pandemic related costs. In UE 399, SBUA had petitioned for case certification on April 14, 2022, and, following intervenor funding related communications with regard to SBUA meeting requirements, the Commission granted case certification on August 22, 2022 in Order 22-305. This Order 22-305 limited to \$9,000 the possible combined issue funds SBUA could receive total in UG 435, UE 399, and UM 2114. SBUA filed a UE 399 Amended Proposed Budget on October 25, 2022, and also confirmed in December 2022 payment of required matching in UE 399. The Commission approved this amended proposed budget on May 9, 2023 in Order 23-165.³ Though the Order 23-165 approved the budget of \$27,650, the Commission noted that the amount remaining in the 2022 PacificCorp Issue fund account was approximately \$7,300.⁴ This amount, \$7,300, was hugely insufficient to cover the costs including costs of the experts incurred in the UE 399 rate case which included the COVID-19 costs that were negotiated during that rate case.

² Errata Order 22-437 correcting Order 22-388 Disposition: First Partial Stipulation Adopted Subject to Modification; Second and Third Partial Stipulations Adopted; Application for General Rate Revision Approved as Revised on October 24, 2022.

³ Parties to the UE 399 PacificCorp dba Pacific Power Request for General Rate Revision settled the COVID-19 2020 and 2021 deferred costs in a UE 399 Third Partial Stipulation adopted by Order 22-491 First, Second, and Third Partial Stipulations Adopted; Request for Clarification Granted, on December 16, 2022, and SBUA has itemized its costs herein

⁴ This was similar to the previous UE 394 PacificCorp dba Pacific Power Request for General Rate Revision when funds were reduced preventing recovery of funds for which SBUA had been found eligible.

Subsequently, in 2023, other utilities' costs stemming from the UM 2114 docket were resolved. On March 21, 2023, the Commission approved Portland General Electric Company ("PGE") ADV 1474 Advice No 22-45 Schedule 152 Major Event Cost Recovery.

SBUA with its expert participated in negotiations regarding this PGE docket allocating UM 2114 related deferred costs. As a result of this advice filing the COVID-19 deferred costs were not included in the UE 416 PGE Request for General Rate Revision also filed in 2023.⁵

b) SBUA contributions to the UM 2114 docket:

The background of the docket UM 2114 is well-known by stakeholders participating in the docket including parties to the UM 2114 Stipulated Agreement on Effects of COVID-19 Pandemic on Energy Utility Customers approved on November 5, 2020 in Order 20-401. SBUA had provided evidence-based information regarding how small business customers across all the utilities should be treated and also how COVID-19 costs should be allocated on a cost causation basis. SBUA and several businesses and business groups had advocated a UM 2114 workshop to work this out ahead of the cost recovery process. However, in addition to the participation of SBUA in UM 2114 docket since before the docket was opened, the COVID-19 related costs deferrals have been dealt with utility by utility.

Meanwhile, SBUA has incurred additional costs in representing small commercial customers with regard to Pacificorp dba Pacific Power, Portland General Electric, Idaho Power, Avista, and Cascade Natural Gas. The additional costs regarded allocating deferred COVID-19 related costs to ratepayers in the different utilities, and other representation. The previous para-

⁵ In addition, in 2023, the UM 2114 related costs deferred in the Cascade Natural Gas were resolved in 2023 though costs incurred by SBUA in this process were *de minimis*.

graphs explain SBUA's role in resolving costs allocated to PacifiCorps dba Pacific Power and Portland General Electric Rate payers. With regard to Idaho Power Company, SBUA had provided education and input to local government resulting in use of ARPA to reduce the arrearages of small commercial customers.⁶ In 2023, Commission Staff notified SBUA regarding Cascade Natural Gas COVID-19 deferral resolution resulting in *de minimus* costs to SBUA.

Regarding the spread of SBUA costs among the different utilities, in the February 25, 2022 SBUA had responded to a Bench Request as requested regarding how a UM 2114 budget would be spread across different utilities.

c) SBUA includes additional recent documentation in Confidential Exhibit A demonstrating payments sufficient to meet the 20% requirement.⁷

3. PROPOSED AMENDED BUDGET

Taking into account Order 22-161 and 22-304, within the framework of the Fifth IFA, SBUA submits this UM 2114 Amended Proposed Budget and Exhibit A specifically for the COVID-19 related work SBUA has performed in docket UM 2114 with respect to all the Utilities participating in that docket, and also in dockets UE 399 PacifiCorp dba Pacific Power, Portland General Electric ADV 1474.⁸ Provision 6.7 of the Fourth and of the Fifth IFA states, "At any time during the proceeding, an intervenor who received Commission approval for an Issue Fund Grant may file to amend its budget and request additional funding due to unforeseen changes in the scope or complexity of issues, positions taken by other parties, changes in the schedule of the

⁶ See *infra* Fnt 10 re Idaho Power Company resolution of COVID-19 deferred costs.

⁷ Forthcoming via confidential facsimile.

⁸ Work regarding Cascade Natural Gas resolution of COVID-19 pandemic costs was *de minimus* and is not included in this Amended Proposed Budget.

case, or other good cause.”⁹ This Proposed Amended Budget is based on all of the above. Addition of significant and detailed COVID-19 costs in the UE 399 docket created changes in scope of that rate case, and the position of the parties with regard to UM 2114 where the parties have negotiated or litigated various resolutions in the different rate cases regarding NW Natural (UG 435 & UG 411), Idaho Power¹⁰, the Commission’s October 25, 2022 letter to Avista Utilities adopting Staff Report as resolution to that utility’s 2020 and 2021 COVID-19 deferrals (Advice No. 22-02-G), and Cascade Natural Gas.

Certainly the schedule of the case has changed as each utility resolves in timing specific to the different utilities. There is good cause to approve this Amended Proposed Budget. The COVID-19 costs have been resolved individually per utility and, while the docket remains open, SBUA believes most of its work to be concluded in the docket. Small commercial customers were significantly impacted by this COVID-19 pandemic in Commission proceedings. For example, significant costs were allocated to ratepayer classes including Pacific Power Schedule 23 and Portland General Electric Schedule 32 customers.

The Proposed Budget Exhibit A reflects SBUA’s revised budget.

Along with this UM 2114 Amended Proposed Budget in Exhibit 1, SBUA submits under seal as a confidential Exhibit 2, Supplemental information to demonstrate 20% paid as required for an issue fund intervenor funding grant under the IFA.

⁹ Fifth IFA section 6.7; Fourth IFA.

¹⁰ Order 22-192 approving Stipulation filed on May 12, 2022 in UE 401 Idaho Power Company’s 2021 Annual Power Supply Expense True-Up, including paragraph 21 resolving allocation of deferred COVID-19 costs from March 2020 through December 31, 2022).

SBUA's expert in COVID-19 cost allocation is well-experienced in such proceedings and has provided consistent testimony regarding COVID-19. SBUA incurred also expenses of a second expert and technical assistance in this docket.

Small commercial customers benefit from this participation by SBUA which advocates implementing standard rate making principles, that is, "cost causation" when it comes to allocating costs of COVID-19 where those who receive the direct benefits pay the costs, thus supporting fair and reasonable rates.

The particular customer classes that has benefitted from SBUA's participating in the proceeding have been the PacifiCorp dba Pacific Power Schedule 23, the Portland General Electric Schedule 32 customers, and small commercial customers of Cascade Natural Gas, Avista Utilities, and Northwest Natural Gas (RS 03).

(d) Identification of the specific account or accounts from which the intervenor is seeking an Issue Fund Grant and an estimate of the amount of available funds in each account.

The accounts and respective balances from which SBUA seeks Issue Fund grants are PacifiCorp dba Pacific Power ("PacifiCorp") \$68,004, Portland General Electric ("PGE") \$718 issue fund balance and \$10,000 case certified, Cascade Natural Gas, \$102,675, and Avista Utilities, \$5,000 case certified, and Idaho Power, \$63,000.¹¹

UM 2114 Amended Proposed Budget Exhibit A is attached addressing (e), (f), and (g): a budget showing estimated attorney fees, which may include the cost for appropriate support staff and operational support, a budget showing estimated consultant fees and expert witness

¹¹ Available at a spreadsheet linked to: <https://www.oregon.gov/puc/filing-center/pages/intervenor-funding.aspx> (last accessed August 24, 2023).

fees, which may include the cost for appropriate support staff and operational support, and a representation that the intervenor 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 the work to be performed for which the intervenor is seeking an Issue Fund Grant.

4. CONSULTATION

SBUA has provided this Motion substantially the same to the utilities and stakeholders Citizens Utility Board of Oregon (“CUB”) and Alliance of Western Energy Consumers (“AWEC”), PacifiCorp dba Pacific Power on July 27, 2023, and to Portland General Electric Company, Cascade Natural Gas, Avista Utilities, and Northwest Natural on August 28, 2023. PacifiCorp dba Pacific Power and Avista Utilities take no position, CUB opposes, and AWEC opposes the requests to the extent they request funding other than from the Case Certified Account. The other utilities have not responded.

SBUA also sought input on shorter briefing schedule, CUB responded referencing the OAR 860-001-0420 default timing for substantive motions. No other party responded regarding scheduling.

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5. CONCLUSION

SBUA submits the information above and attached as its Amended Proposed Budget and to assist its representation of small business and small nonresidential a.k.a. small general service or small commercial ratepayers for the Commission's consideration. SBUA respectfully requests consideration within the timeframe identified in the Fifth IFA with regard to this request.

Respectfully submitted.: September 1, 2023.



s/ Diane Henkels

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UM 2114

EXHIBIT A

SBUA Amended Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
Expert (Kermode) COVID-19 impacts in UM 2114: expert input, analysis, comment preparation; Division 21 rulemaking	31	\$150	\$4,650
Expert 1 (Steele) PacifiCorp COVID-19 cost recovery review information, analysis, testimony UE 399	17	\$150	\$2,550
Expert 2 (Kermode) PacifiCorp COVID-19 cost recovery research & review data, analysis, testimony, negotiation UE 399	35	\$150	\$5,250
Expert (Kermode) PGE cost recovery research, analysis, negotiation ADV 1474	9	\$150	\$1,312
Technical assistant/paralegal UM 2114	10	\$50	\$500
Law clerk UM 2114 cost recovery in UE 399	10	\$50	\$500
Executive Director UM 2114 & UE 399	10	\$200	\$2,000
Attorney UM 2114 & UE 399	20	\$250	\$5,000
Subtotal			\$21,762
20% of SBUA Funded Expenditures			\$4,360
Total SBUA Amended Issue Fund Grant Proposed Request			\$15,800

