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**Subject:** FW: UM 2114/UE 399 Public Comment  
**Date:** Friday, October 20, 2023 12:12:30 PM

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*Kristi*

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**From:** Gordon Feighner <[gordonjamonhawthorne@gmail.com](mailto:gordonjamonhawthorne@gmail.com)>  
**Sent:** Friday, October 20, 2023 10:16 AM  
**To:** PUC [puc.publicmeetings](#) \* PUC <[puc.publicmeetings@puc.oregon.gov](mailto:puc.publicmeetings@puc.oregon.gov)>  
**Subject:** UM 2114/UE 399 Public Comment

You don't often get email from [gordonjamonhawthorne@gmail.com](mailto:gordonjamonhawthorne@gmail.com). [Learn why this is important](#)

My name is Gordon Feighner and I am a member of the advisory committee for Small Business Utility Advocates (SBUA). I am currently a small business owner, but in a previous career I worked for Citizens' Utility Board to represent residential customers in PUC dockets. In doing that work I was often struck by the lack of representation for small commercial customers. They seemed stuck in a place that was not covered by residential advocates, and the larger commercial customers like Fred Meyer and Wal-Mart would usually have their own representation. As a result, the rate classes that encompassed small business customers would sometimes end up getting an outsized burden of a rate increase. For the past few years SBUA has been doing an excellent job advocating for small business customers and ensuring that our interests are represented. SBUA should have a seat reserved at the table for all future discussions of PUC issues that impact small businesses.

I am submitting this comment in support of the Commission's granting this UE 399 & UM 2114 Motion and approving the UM 2114 Amended Proposed Budget. The filing asks the Commission to allow issue funds in 2023 to cover the following costs: COVID-19 related costs in the PacifiCorp rate case; the PGE COVID-19 cost allocation process (ADV 1474); the cost of SBUA participation in the UM 2114 docket generally. In addition, the filing requests allowing recovery of the remaining PacifiCorp \$7,300 funds in 2022 issue fund.

Earlier this year SBUA filed to recover intervenor funding for the significant work it to represent small commercial customers did in UE 399 and UM 2114. Both dockets included significant meeting time, data collection and review, expert analysis, preparation of public comments and testimony, and negotiation. The Commission had determined in both dockets that SBUA did represent small customer interests and that it satisfied criteria for intervenor funding generally.

However, the Commission had limited SBUA's recovery at first to \$9000 for all activity in 2022, which included two rate cases (NW Natural and Pacific Power) and UM 2114. The Commission determined in May 2023 to grant SBUA's amended budget in UE 399, but noted that there was only \$7,311 remaining in the 2022 PacifiCorp funds. This amount is insufficient to pay costs incurred for experts in the rate case, let alone other staff time. In UM 2114 SBUA is in the process of satisfying payment of 20% of the proposed amended budget of \$21,712, as stipulated in SBUA's issue fund request of \$15,800. I encourage the Commission to grant SBUA's UE 399 & UM 2114 Motion to Reallocate Issue Funds and to approve SBUA's UM 2114 Amended Proposed Budget.

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Gordon Feighner, Owner/CFO (he/him)

Jam on Hawthorne

2239 SE Hawthorne Blvd

Portland, OR 97214

503.234.4790

[jamonhawthorne.com](http://jamonhawthorne.com)