

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 435**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Request for a General Rate Revision

VERDE'S REQUEST FOR PAYMENT
AND PROPOSED FIRST AMENDED
BUDGET

Pursuant to Order No. 24-239, Verde's proposed budget and request for a case fund grant from Portland General Electric's (PGE) Case Funds was approved in the amount of \$45,000 and the Company was directed to transmit a partial payment of \$22,500 which Verde received. This request seeks the amount of \$27,600 (the remaining \$22,500 plus an additional amount of \$5,100 for staff and attorney fees requested in the amended budget) and the approval of an Amended Budget which reallocates approved expenses to other eligible expenses and requests additional funds.

Verde's staff time and attorney fees expenses have exceeded the proposed and approved line-item budgeted amounts. The Amended Budget seeks approval of a reallocation of the consultant expenses. The proposed Amended Budget is attached as Exhibit A.

Request for Payment

As stated in the Environmental Justice Communities Funding Agreement (Agreement) approved in Order No. 23-033, to receive payment for a grant fund approved, a grantee must

submit a request for payment to the Commission and serve the relevant Utilities. The request for payment must: 1) itemize the expenses, payees, and hourly rates; 2) demonstrate that the expenses are reasonable and directly attributed to the issues pursued and consistent with the proposed/approved budget; 3) provide information sufficient information demonstrating compliance with any condition or requirement of the grant; and 4) specify if the requested payment is for a progress payment or final payment.

Verde submits herewith directly to the Commission and PGE a Confidential Statement of itemized expenses which includes hourly rates and time directly attributed to the issues and positions pursued consistent with Verde's amended approved budget for eligible expenses. The itemized report is designated Attachment B. It demonstrates that eligible expenses exceeding the grant amount of \$45,000 have been incurred directly related to the issues raised and litigated in this General Rate Revision case.

The expenses incurred are reasonably and directly related to the issues, positions, and work product Verde expended to participate as an intervenor in the UE 435 contested case proceeding in which no issue was settled and all issues including those raised by Verde related to affordability and affordability mechanisms, bill discount program changes, disconnection and arrearages mitigation proposals, reporting and stakeholder engagement and procedural equity proposals, and energy efficiency and weatherization continue to be litigated. These issues and proposals were raised on behalf of PGE's environmental justice and frontline community customers. When developing the proposed budget, it was not anticipated that every issue in the case would be litigated to Commission decision. The reasons the original proposed budget was

exceeded and the amended budget is proposed is related to the following unanticipated circumstances: 1) the volume of testimony, DRs and briefing among the eight parties was voluminous as there were more than 62 discreet issues, PGE filed more than 1500 pages of testimony and responded to 1,187 data requests and the opening briefing exceeded 400 pages; 2) relatedly, none of those issues resulted in a formal stipulation and all of them are presented for resolution by the Commission; and 3) issues presented and litigated in this docket are also being considered in PGE's Adv. No. 24-19 and UM 2211. For the reasons stated in Verde's UM 435 Notice of Intent; Request for Justice Funding Case Fund Grant; and Proposed Budget (May 17, 2024) incorporated by this reference, the expenses/reallocation meet the requirements of Section 6.4 of the Agreement.

As Verde received an up-front partial payment in the amount of \$22,500, this request for payment seeks an order directing PGE to pay to Verde \$27,600 from PGE's Justice Fund Case Fund.

This request is late under the terms of the Agreement and Verde requests waiver of the applicable rule for good cause, pursuant to OAR 860-001-0000. Due to the press of business and changes in organizational staffing at Verde, additional duties were assigned to Verde's Energy Justice Coordinator and other staff. This delayed the preparation of the itemized statement necessary to seeking a request for payment. Moreover, while undersigned counsel and Verde were initially aware of the initial November and then ultimate deadline of December 15 for filing, as the delay persisted a mistaken belief that Verde had some reasonable amount of time to file its final request after issuance of the Final Order (December 20, 2024) in this case was a

further cause of the delay. Verde respectfully requests waiver of the December 15th filing deadline.

Respectfully submitted this 27th Day of December, 2024.

/s Tonia Moro

Tonia L. Moro

Counsel for Verde

EXHIBIT A

VERDE'S PROPOSED FIRST AMENDED BUDGET

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First Amended Eligible Expenses/Budget

Employee/Consultant	Rate	Hours	Total
Energy Justice Coordinator	100	51	5,100
Counsel Tonia Moro	300	150	45,000
Consultant/Expert			0
			50,100