

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 180 / UE 181 / UE 184

In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Request for a General Rate Revision (UE 180),
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Annual Adjustments to Schedule 125 (2007 RVM Filing) (UE 181),
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Request for a General Rate Revision relating to the Port Westward plant (UE 184).

LEAGUE OF OREGON CITIES'
PROPOSED BUDGET FOR
AN ISSUE FUND GRANT

Pursuant to Section 6.3 of the Intervenor Funding Agreement (“IFA”),¹ the League of Oregon Cities (the “League”) hereby submits a proposed budget for an Issue Fund Grant to be used in connection with the League’s participation in the consolidated proceedings docketed as UE 180, UE 181 and UE 184 captioned above (collectively, “UE 180”). As set forth herein, the League requests an Issue Fund Grant in the amount of \$14,025.00. Along with an equal amount of its own monies budgeted for participation in UE 180, the League intends to use these requested grant funds to actively represent the collective interests of a broad group or class of retail customers comprised of all fifty two (52) cities served by Portland General Electric (“PGE”). These cities provide a wide variety of services

¹ The IFA was approved by the Oregon Public Utility Commission (“Commission”) in Order No. 03-388 (July 2, 2003).

and otherwise consume energy in a manner that causes them to take service under a number of schedules PGE seeks to revise in these proceedings. The League's active representation and advocacy on behalf of all municipalities served by PGE will afford them a better understanding of how PGE's proposed rate increases could impact the cost and quality of the service they receive.

In addition to the direct benefits to be had by the broad range of cities served by PGE, the League believes its representation should also benefit a number of other classes of customers with similar usage patterns. Other customers likely to benefit from the League's active representation include, for example: (1) general small business and medium to large commercial consumers; (2) consumers purchasing energy for outdoor lighting, street lighting, traffic signals and recreational facilities; and, (3) customers purchasing energy for use in water supply, wastewater treatment and other activities involving water pumping.

The following information is provided in accordance with Section 6.3 of the IFA:

(1) **Statement of the work to be performed by the League for which the League is seeking the Issue Fund Grant:**

The League intends to participate in every aspect of UE 180 that could have a substantive impact on the issues the League intends to address. The League anticipates that its participation will involve activities such as: (a) having representatives attend clarifying sessions, workshops, settlement conferences, oral presentations and discovery related hearings; (b) conducting discovery, sponsoring expert witness testimony (either independently or jointly with other parties); and, (c) preparing briefs and participating in hearings and oral arguments if needed. Conversely, the League will also be reviewing testimony, briefs and other materials filed or otherwise offered by PGE and other parties.

(2) **Description of the areas to be investigated by the League.**

PGE's application in UE 180 raises a number of issues that the League believes warrant further investigation. In representing the interests of its member cities, the League intends to investigate the following:

A. *Outdoor Lighting Service.* PGE's proposes to increase the rates charged for outdoor lighting, street lighting, traffic signals and recreational facility lighting by 6 – 24% (averaging 12.5%). The League intends to investigate the bases for PGE's proposal and suggest methods to mitigate or reduce this increase. In addition, the League proposes to investigate other terms and conditions of service being proposed by PGE in connection with service to these facilities.

B. *Direct Access Issues for Small Nonresidential and smaller Large Nonresidential consumers.* PGE proposes to divide the existing Schedule 83 customer class into smaller subsets that will be eligible for differing rates, terms and conditions for direct access service. The League intends to analyze PGE's proposal and assess its impact on select representative cities energy costs. In addition, the League intends to investigate PGE's proposal to expand the direct access election windows for some but not all of existing Schedule 83 consumers.

C. *General Impact on Municipal Energy Costs and Risks.* As part of its participation in this proceeding, the League intends to update previous work it has done in connection with assessing the practical application of PGE's proposed rate increase on a sample of cities served by PGE. The League believes that its assessment will provide insight into the impact PGE's proposal will likely have on customers who's usage spans multiple rate schedules.

D. *Issues Potentially Impacting Service Restoration and other Public Service Commitments.* PGE currently has in place a number of policies and procedures related to the manner in which it

restores service following weather-related or other events causing service interruptions. The League intends to investigate the staff reductions and similar components that are a part of PGE's proposal in order to ensure that PGE can continue to maintain its existing public service commitments.

(3) **Description of the particular customer class or classes that will benefit from the League's participation:**

The League's participation will directly benefit the fifty two (52) cities that receive retail service from PGE. The League has participated in previous PGE rate cases and proceedings and has retained experienced legal counsel and expert witnesses so that it will be able to provide thorough and capable analyses and representation. In addition to the large group of cities that will directly benefit, the League's efforts will also benefit members of other customer classes (listed above in the introductory portion of this submittal) whose usage patterns are similar to those of the cities.

(4) **Identification of the specific Fund account from which the League is seeking the Issue Fund Grant:**

The League seeks an Issue Fund Grant in the amount of \$14,025.00 to be allocated from the PGE Issue Fund Account established under IFA Section 4.2.3.

(5) **Budget showing estimated attorney and consultant fees and expert witness fees:**

Attached as Exhibit A is the League's estimate of its attorney and consultant fees for UE 180. The proposed budget amount of \$14,025.00 is only one half of the League's anticipated total budget and was developed in anticipation of a proceeding that does not settle but instead proceeds through briefing and to a final order. The League developed this budget based upon the estimates of potential consultants and expert witnesses it contacted regarding this proceeding and the experience of the

League's counsel in providing legal representation in similar proceedings.

Therefore, the League respectfully requests that the Commission issue an order granting an Issue Fund Grant from the PGE Issue Fund in the amount of \$14,025.00.

Dated this 30th day of May, 2006.

Respectfully submitted,

/s/ Jim Deason
Jim Deason
521 SW Clay Street, Suite 107
Portland, Oregon 97201
(503) 223-4335 phone
(503) 261-1321 facsimile
email: jimdeason@comcast.net

Attorney for the League of Oregon Cities

***Exhibit A:
League of Oregon Cities' Proposed Budget***

<u>Activity</u>		<u>Hours</u>	<u>Rate</u>	<u>Cost</u>
<i>Case Preparation</i>				
Review filings and testimony, legal research, develop case strategy, prepare testimony, communications with expert witnesses, prepare issue statements	Sr. Attorney	30	190.00	5,700.00
<i>Discovery and Case Processing</i>				
Prepare draft data requests; respond to data requests; review discovery responses and resolve discovery disputes; take and/or defend depositions; draft and review procedure and discovery related pleadings; attend hearings regarding procedural and discovery issues; attend meetings and communications with clients and third parties	Sr. Attorney	25	190.00	4,750.00
<i>Settlement Discussions; Hearings; Workshops</i>				
Preparation for and attendance at settlement meetings; review and respond to settlement proposals; prepare for and attend workshops and Commission-sponsored hearings and meetings	Sr. Attorney	15	190.00	2,850.00
<i>Post-Hearing Briefing/Oral Argument</i>				
Prepare for and attend oral argument, draft briefs, legal research related to briefs	Sr. Attorney	25	190.00	4,750.00
	Total Hours	95	Sub-Total	18,050.00
<i>Expert Witness Fees</i>				
LOC Witness (direct access, street lighting, franchise fee)				10,000.00
			Sub-Total	10,000.00
<u>Expenses</u>				
Travel Expenses (Mileage for both Attorney and Consultant)				200.00
Printing and Reproduction				100.00
			Sub-Total	300.00
LOC Total Budget				\$28,050.00
LOC Issue Fund Grant Request (50% of total budget)				\$14,025.00

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing LEAGUE OF OREGON CITIES' PROPOSED BUDGET FOR AN ISSUE FUND GRANT PETITION TO INTERVENE OF THE LEAGUE OF OREGON CITIES to be served upon each party listed on the attached service list by email, or, when not available, by mail, postage prepaid, and upon the Commission by email and by sending the original plus (1) copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

Dated this 30th day of May, 2006.

Respectfully submitted,

/s/ Jim Deason

Jim Deason

521 SW Clay Street, Suite 107

Portland, Oregon 97201

(503) 223-4335 phone

(503) 261-1321 facsimile

email: jimdeason@comcast.net

Attorney for the League of Oregon Cities

W=Waive Paper service, Q=Confidential

JIM DEASON
ATTORNEY AT LAW

521 SW CLAY ST STE 107
PORTLAND OR 97201-5407
jimdeason@comcast.net

ROBERT VALDEZ

PO BOX 2148
SALEM OR 97308-2148
bob.valdez@state.or.us

AF LEGAL & CONSULTING SERVICES

ANN L FISHER
ATTORNEY AT LAW

2005 SW 71ST AVE
PORTLAND OR 97225-3705
energlaw@aol.com

BOEHM KURTZ & LOWRY

KURT J BOEHM (Q)
ATTORNEY

36 E SEVENTH ST - STE 1510
CINCINNATI OH 45202
kboehm@bkllawfirm.com

MICHAEL L KURTZ (Q)

36 E 7TH ST STE 1510
CINCINNATI OH 45202-4454
mkurtz@bkllawfirm.com

BONNEVILLE POWER ADMINISTRATION

GEOFFREY M KRONICK LC7 (Q)

PO BOX 3621
PORTLAND OR 97208-3621
gmkronick@bpa.gov

CRAIG SMITH

PO BOX 3621--L7
PORTLAND OR 97208-3621
cmsmith@bpa.gov

BRUBAKER & ASSOCIATES, INC.

JAMES T SELECKY (Q)

1215 FERN RIDGE PKWY, SUITE 208
ST. LOUIS MO 63141
jtselecky@consultbai.com

CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP

TAMARA FAUCETTE

1001 SW 5TH AVE STE 2000
PORTLAND OR 97204
tfaucette@chbh.com

CHAD M STOKES

1001 SW 5TH - STE 2000
PORTLAND OR 97204
cstokes@chbh.com

CITIZENS' UTILITY BOARD OF OREGON

LOWREY R BROWN (Q)
UTILITY ANALYST

610 SW BROADWAY - STE 308
PORTLAND OR 97205
lowrey@oregoncub.org

JASON EISDORFER (Q)
ENERGY PROGRAM DIRECTOR

610 SW BROADWAY STE 308
PORTLAND OR 97205
jason@oregoncub.org

COMMUNITY ACTION DIRECTORS OF OREGON

JIM ABRAHAMSON (Q)
COORDINATOR

PO BOX 7964
SALEM OR 97303-0208
jim@cado-oregon.org

CONSTELLATION NEWENERGY INC

WILLIAM H CHEN
REGULATORY CONTACT

2175 N CALIFORNIA BLVD STE 300
WALNUT CREEK CA 94596
bill.chen@constellation.com

DANIEL W MEEK ATTORNEY AT LAW

DANIEL W MEEK
ATTORNEY AT LAW

10949 SW 4TH AVE
PORTLAND OR 97219
dan@meek.net

DAVISON VAN CLEVE PC

S BRADLEY VAN CLEVE (Q)

333 SW TAYLOR - STE 400
PORTLAND OR 97204
mail@dvclaw.com

DEPARTMENT OF JUSTICE

STEPHANIE S ANDRUS (Q)
ASSISTANT ATTORNEY GENERAL

REGULATED UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096
stephanie.andrus@state.or.us

EPCOR MERCHANT & CAPITAL (US) INC

LORNE WHITTLES
MGR, PNW MARKETING

1161 W RIVER ST STE 250
BOISE ID 83702
lwhittles@epcor.ca

KAFOURY & MCDUGAL

LINDA K WILLIAMS
ATTORNEY AT LAW

10266 SW LANCASTER RD
PORTLAND OR 97219-6305
linda@lindawilliams.net

LEAGUE OF OREGON CITIES

ANDREA FOGUE
SENIOR STAFF ASSOCIATE

PO BOX 928
1201 COURT ST NE STE 200
SALEM OR 97308
afogue@orcities.org

LEBOEUF LAMB GREENE & MACRAE LLP

SCOTT H DEBROFF

200 N 3RD ST, STE 300
HARRISBURG PA 17108-2105
sdebroy@llgm.com

MCDOWELL & ASSOCIATES PC

KATHERINE A MCDOWELL
ATTORNEY

520 SW SIXTH AVENUE, SUITE 830
PORTLAND OR 97204
katherine@mcd-law.com

W NORTHWEST ECONOMIC RESEARCH INC

LON L PETERS

607 SE MANCHESTER PLACE
PORTLAND OR 97202
lpeters@pacifier.com

NORTHWEST NATURAL

ELISA M LARSON (Q)
ASSOCIATE COUNSEL

220 NW 2ND AVE
PORTLAND OR 97209
elisa.larson@nwnatural.com

ALEX MILLER (Q)
DIRECTOR, REGULATORY AFFAIRS

220 NW SECOND AVE
PORTLAND OR 97209-3991
alex.miller@nwnatural.com

OREGON ENERGY COORDINATORS ASSOCIATION

KARL HANS TANNER (Q)
PRESIDENT

2448 W HARVARD BLVD
ROSEBURG OR 97470
karl.tanner@ucancap.org

PACIFICORP

LAURA BEANE
MANAGER, REGULATION

825 MULTNOMAH STE 800
PORTLAND OR 97232-2153
laura.beane@pacificorp.com

W PORTLAND CITY OF - OFFICE OF CITY ATTORNEY

BENJAMIN WALTERS
DEPUTY CITY ATTORNEY

1221 SW 4TH AVE - RM 430
PORTLAND OR 97204
bwalters@ci.portland.or.us

W PORTLAND CITY OF - OFFICE OF TRANSPORTATION

RICHARD GRAY
STRATEGIC PROJECTS MGR/SMIF ADMINISTRATOR

1120 SW 5TH AVE RM 800
PORTLAND OR 97204
richard.gray@pdxtrans.org

W PORTLAND CITY OF ENERGY OFFICE

DAVID TOOZE
SENIOR ENERGY SPECIALIST

721 NW 9TH AVE -- SUITE 350
PORTLAND OR 97209-3447
dtooze@ci.portland.or.us

PORTLAND GENERAL ELECTRIC

RATES & REGULATORY AFFAIRS

RATES & REGULATORY AFFAIRS
121 SW SALMON ST 1WTC0702
PORTLAND OR 97204
pge.opuc.filings@pgn.com

DOUGLAS C TINGEY (Q)

121 SW SALMON 1WTC13
PORTLAND OR 97204
doug.tingey@pgn.com

PRESTON GATES ELLIS LLP

HARVARD P SPIGAL

222 SW COLUMBIA ST STE 1400
PORTLAND OR 97201-6632
hspigal@prestongates.com

SEMPRA GLOBAL

THEODORE E ROBERTS

101 ASH ST HQ 13D
SAN DIEGO CA 92101-3017
troberts@sempra.com

LINDA WRAZEN

101 ASH ST, HQ8C
SAN DIEGO CA 92101-3017
lwrazen@sempraglobal.com