

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 189

In the Matter of)	
)	CUB REQUEST FOR A
PORTLAND GENERAL ELECTRIC,)	PGE ISSUE FUND GRANT &
)	PROPOSED BUDGET
Request to Add Schedule 111, Advanced)	
Metering Infrastructure (AMI).)	
_____)	

The Citizens' Utility Board of Oregon (CUB) requests a grant of \$19,983 from the PGE Issue Fund.

CUB is precertified as per OAR 860-012-0100(3)(a). UE 189 is an eligible proceeding under the Intervenor Funding Agreement, adopted by the Commission in Order No. 03-388 (July 2, 2003), because the proceeding directly affects PGE, a participating public utility. Agreement, 1(c). CUB filed its Notice of Intent to Request a PGE Issue Fund Grant concurrent with its Notice of Intervention, as required by the Intervenor Funding Agreement. Agreement 6.2.

Pursuant to paragraph 6.3 of the Intervenor Funding Agreement, the proposed budget must identify certain points of information. We provide the information below.

1) *Statement of Work to be Performed:* CUB intends to participate in every procedural aspect of this case. We participated in the pre-hearing conference. We will attend and participate in all or most workshops, hearings, and settlement meetings. We will review and analyze the Company's filing, its rebuttal testimony, and its briefs. We

will file reply testimony and briefs and will review other parties' reply testimony and briefs. We will pursue discovery of PGE through data requests, and we will respond to data requests asked of us. We will evaluate PGE's business case, the Company's assumptions, and identify risks and benefits associated with the Company's AMI request. We will propose appropriate conditions to protect customers from identified risks, and will develop a position as to whether the application is appropriate at this time, and will offer a recommendation to the Commission.

2) *Description of Areas to be Investigated:* CUB intends to investigate many issues related to this application, including, but not limited to:

- A. The assumptions upon which PGE's business case is based.
- B. The sensitivity of PGE's business case to changes in costs or circumstances.
- C. The appropriateness of PGE's proposed accelerated depreciation tariff.
- D. The opportunities in direct load control afforded by advanced metering.
- E. The possible impacts on low-income customers of advanced metering and the changes in program and process that may accompany it.
- R. The cost associated with abandoning PGE and NW Natural's joint meter reading program.

3) *Description of the Class or Classes Benefiting from CUB's Participation:*

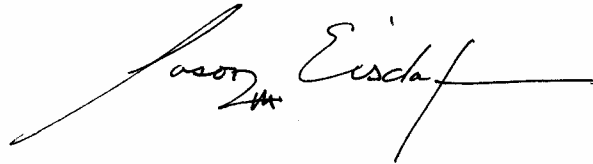
CUB represents the interests of PGE's residential customers, though other customer classes may benefit from many aspects of our participation.

4) *The Specific Fund from which CUB Seeks an Issue Fund Grant:* CUB is seeking an issue fund grant from the PGE Issue Fund.

5) *The Budget Showing Estimated Fees and Costs:* CUB's budget accompanies this

document as Attachment A. The total grant request from the PGE Issue Fund is \$19,983. This assumes a fully litigated case; settlement of some or all issues would reduce the ultimate request for reimbursement. CUB staff will keep track of their participation by hours and activity.

Dated this 25th Day of April, 2007
Respectfully submitted,

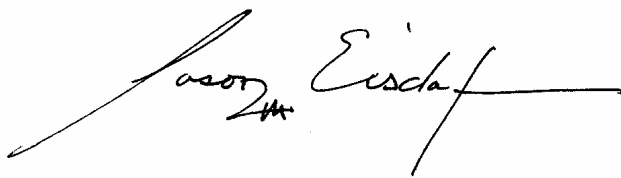
A handwritten signature in black ink, appearing to read "Jason Eisdorfer". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jason Eisdorfer #92292
Attorney for Citizens' Utility Board of Oregon

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of April, 2007, I served the foregoing Request for a PGE Issue Fund Grant & Proposed Budget of the Citizens' Utility Board of Oregon in docket UE 189 upon each party listed below, by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending 2 copies by U.S. mail, postage prepaid, to the Commission's Salem offices.

Respectfully submitted,



Jason Eisdorfer Attorney #92292
The Citizens' Utility Board of Oregon

W=Waive Paper service, C=Confidential, HC=Highly Confidential

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PORTLAND GENERAL ELECTRIC

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CUB Budget - UE 189

CUB Internal Expenses	Rate	Hours	Cost
<i>Staff</i>			
Bob Jenks, Executive Director	\$115.00	60	\$6,900.00
Jason Eisdorfer, Attorney	\$150.00	35	\$5,250.00
Lowrey Brown, Utility Analyst	\$75.00	100	\$7,500.00
Shannon Floyd, Business and Projects Mgr	\$40.00	5	\$200.00
<i>Other Expenses</i>			
Printing & Mailing			\$66.00
Travel			\$67.00
Total			\$19,983