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April 28, 2017

Public Utilities Commission of Oregon
Filing Center
POB 1088
Salem, OR 97308-1088
Puc.filingcenter@state.or.us

RE: UE 319 Portland General Electric Company Request for General Rate Revision
Effective

Attention Filing Center:

Small Business Utility Advocates (“SBUA”) submits this Proposed Budget of SBUA in
the event the previously filed Petition for Case Certification of SBUA is granted.

Please contact me with any questions.

Sincerely,

/s/ Diane Henkels

Diane Henkels
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Counsel for SBUA
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Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 319

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PROPOSED BUDGET FOR ISSUE FUND
COMPANY)	GRANT FOR SMALL BUSINESS
)	UTILITY ADVOCATES
)	
)	
Request for a General Rate Revision)	
)	
)	
)	

In the event that the Commission grants SBUA’s Petition for Case Certification filed on April 28, 2017 now Small Business Utility Advocates (“SBUA”) by and through its legal counsel to file this Proposed Budget for Issue Fund Grant. SBUA certifies that it did confer by phone with Portland General Electric (“PGE”) legal counsel on April 28, 2017 prior to filing the Petition for Case Certification regarding SBUA’s seeking intervenor funding in this docket and, similar to other dockets, PGE counsel did not state a position.

Pursuant to Section 6.3 of the Third Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) in Order 15-335, Order 16-113, and OAR 860-001-0120, SBUA respectfully submits this Proposed Budget for Issue Fund Grant (“Proposed Budget”) in UE 319 seeking an Issue Fund Grant in the amount of \$14,414. The following information is provided in accordance with Section 6.3 of the IFA:

1. Statement of the work performed by SBUA for which SBUA is seeking the Issue Fund Grant:

SBUA has retained Cleantech Law Partners PC to represent SBUA in UE 319. Counsel for SBUA will attend workshops, conferences, public meetings, and oral presentations, and

will submit filings and otherwise participate at the different stages in the docket. SBUA has retained an expert witness to review and assist in analysis and filings.

2. Description of areas to be investigated by SBUA:

SBUA has investigated and intends to investigate further how the requests for proposal process affect small nonresidential, including reviewing among the several reasons set forth for a rate increase, the rationale of 5.7% increase for Schedule 32 small nonresidential ratepayers, the data and analysis justifying an increase in Schedule 32 customer charge of \$2.00 per month, twice as much as the Schedule 7 customer charge, load estimates, and certain costs associated with the customer service and outreach.

3. Description of the particular customer class that benefit from the intervenor's participation.

SBUA's participation will directly benefit small nonresidential customers which are Schedule 32 PGE ratepayers and subject to a 5.7% rate increase and increased customer charge of \$2.00 per month.

4. Identification of the specific Fund account from which SBUA is seeking the Issue Fund Grant:

SBUA is seeking an Issue Fund Grant in the amount of \$14,414 from the PGE Issue Fund Account, established under IFA Section 4.2.3. SBUA understands remaining funds available in the PGE Issue Fund Account is \$0,¹ however, the IFA allows using 2018 funding for the budget. Certainly the Commission has authority under the rules to enable general class of ratepayers' representation to help assure just and reasonable rates.

5. Budget showing estimated attorney and consultant fees and expert witness fees:

Attached as Exhibit A is SBUA's Proposed Budget. The Proposed Budget details the hours and hourly rates of SBUA's attorneys and expert. The Proposed Budget was developed based on work performed in previous general rate case docket though augmented due to

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SBUA's increased expertise to participate in a general rate case and the issues presented in this case.

6. As required by Section 6.5 of the IFA, SBUA represents that it has used and 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 which SBUA is seeking an Issue Fund Grant.

Basis for Request

SBUA respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount \$14,414 based on the following considerations:

1. The costs associated with this rate revision request will directly impact small nonresidential customers some of which are PGE ratepayers.
2. SBUA has begun reviewing and will continue to review PGE's proposals, data, and revised submittals, will attend workshops, presentations and participate in meetings regarding this rate revision process, and submit filings appropriate to this general rate case docket.
3. SBUA represents the interests of small business customers and has experience participating in Commission proceedings involving PGE. SBUA's participation will benefit PGE small business customers and other classes of customers.
4. Pursuant to IFA 5.3 and Commission Order 16-113, and provided that SBUA's Petition for Case Certification is granted and SBUA becomes eligible to submit this Proposed Budget for consideration.

Therefore, SBUA respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount of \$14,414. SBUA prepared the attached budget on the basis of costs incurred in previous cases.

RESPECTFULLY SUBMITTED April 28, 2017.

s/ Diane Henkels

Diane Henkels
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Cleantech Law Partners PC
Counsel for Small Business Utility Advocates

Public Utility Commission of Oregon

**UE 319 PORTLAND GENERAL ELECTRIC GENERAL RATE
REVISION REQUEST**

Exhibit A

Small Business Utility Advocates' Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
Executive Director	6	250	\$3000
Sr. Attorney— Public rate	20	\$285	\$5700
Jr. Attorney	15	\$225	\$3375
Administrative support	40	\$30	\$1200
Expert Witness fees	30	\$150	\$4500
Costs:			
Travel	450	\$0.54	\$243
Subtotal:			\$18018
20% SBUA:			\$3604
Total SBUA Issue Fund Request:			\$14414