



**Portland General Electric Company**

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**David F. White**

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December 28, 2022

Via Electronic Filing

Public Utility Commission of Oregon  
Attention: Filing Center  
201 High Street SE, Suite 100  
Salem, Oregon 97301

Re: **STOP B2H Coalition's request to be found eligible for intervenor funding in UM 2211, AR 638, and AR 626**

Dear Filing Center:

Portland General Electric Company ("PGE") appreciates the opportunity to respond to the request filed by STOP B2H Coalition ("STOP"). That request seeks a determination that STOP is an "Eligible Recipient" and qualifies under HB 2475 in a variety of Commission proceedings. We take no position on the request for dockets in which PGE is not a party (LC 78, PCN 5, UM 2209, and UM 2210). PGE's comments concern solely the dockets to which it is a party (AR 626, AR 638, and UM 2211). For purposes of our comments PGE assumes STOP's request concerns intervenor funding under HB 2475 and not under the intervenor funding agreement between the Citizens' Utility Board, Alliance of Western Energy Consumers, and participating utilities.

A bedrock assumption of the intervenor funding law, rules, and agreements is that intervenor eligibility is based upon the ability of the intervenor to show that it will represent and advocate for the customers of the particular utility from which funding is sought. Utility customers are ultimately responsible for paying for intervenor funding so it is only fair and reasonable that an intervenor must show that it has ties directly to the utility's customers and it represents the interests of the customers of the particular utility from which funding is sought.

Another important foundation of the intervenor funding law is that intervenor funding agreements are voluntary agreements between utilities and intervenors. The law gives the Commission authority to administer such voluntary agreements but the Commission lacks authority to order parties to enter into such agreements.

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To date PGE has been provided with no information or evidence sufficient to show that STOP has direct ties to or represents PGE low-income customers or PGE environmental justice communities. PGE has not been asked to sign, and has not signed, an Interim HB 2475 Funding Agreement with STOP. As such, PGE requests that, whatever action the Commission takes with respect to STOP's petition, it clarifies that it is not finding that STOP is an eligible recipient to receive intervenor funding from PGE and that the Commission is not requiring PGE or any other utility to enter into an intervenor funding agreement with STOP.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in blue ink that reads "David White". The signature is written in a cursive, flowing style.

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