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February 4, 2020

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,
Renewable Resource Automatic Adjustment Clause (Schedule 122)
Docket No. UE 370; and
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,
Renewable Resource Automatic Adjustment Clause (Schedule 122)
(BPSC Energy Storage Microgrid and ARC Energy Storage)
Docket No. UE 372 (Consolidated)

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Proposed Budget for Issue Fund Grant in the above-referenced dockets.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 370, UE 372

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PROPOSED BUDGET FOR ISSUE
COMPANY,)	FUND GRANT OF THE ALLIANCE OF
)	WESTERN ENERGY CONSUMERS
)	
Renewable Resource Automatic Adjustment)	
Clause (Schedule 122) (Wheatridge Renewable)	
Energy Farm) (UE 370), and)	
)	
Renewable Resource Automatic Adjustment)	
Clause (Schedule 122) (BPSC Energy Storage)	
<u>Microgrid and ARC Energy Storage) (UE 372).</u>)	

Pursuant to Article 6.3 of the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 18-017 (January 17, 2018), the Alliance of Western Energy Consumers (“AWEC”) hereby files this Proposed Budget for Issue Fund Grant in consolidated Docket Nos. UE 370 and UE 372 (the “Proceedings”), seeking an Issue Fund Grant in the amount of \$30,000. AWEC respectfully requests that the Commission act on this Proposed Budget within fourteen days of receipt, as provided in Article 6.4 of the IFA. The following information is provided in accordance with Article 6.3 of the IFA.

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

AWEC has retained Davison Van Cleve, P.C. to represent it in Docket Nos. UE 370 and UE 372. AWEC will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in UE 370 and UE 372, and plans to conduct discovery in these

Proceedings. In addition, AWEC will submit expert witness testimony and briefs as called for by the procedural schedule in these Proceedings.

(2) Description of the areas to be investigated by AWEC:

AWEC intends to investigate numerous aspects of PGE's proposed tariff revisions to its Schedule 122, including the prudence of PGE's decision to select the Wheatridge facility, the costs of the Wheatridge facility, and any other issues identified by other parties or through discovery.

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

AWEC's participation will directly benefit large energy consumers, as well as all other large non-residential customers of PGE.

(4) Identification of the specific Fund account from which AWEC is seeking the Issue Fund Grant and Available Funds:

AWEC proposes a total budget of \$37,500 and is seeking an Issue Fund Grant in the amount of \$30,000 from the 2020 PGE Issue Fund. AWEC estimates that the current balance of the 2020 PGE Issue Fund is \$153,332.

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

Attached as Exhibit A is AWEC's proposed budget in UE 370 and UE 372.

(6) Matching Funds

As required by Article 6.3(g) of the IFA, AWEC represents that it will use matching fund resources 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 AWEC is seeking an Issue Fund Grant.

Basis for Request

AWEC respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$30,000, based on the following considerations:

1. PGE's proposed updates to its Schedule 122 may have a direct bearing on the rates paid by AWEC's members who purchase power from PGE. In addition, the case raises important questions of policy and fact.

2. AWEC represents the interests of large energy consumers and has significant experience participating in Commission proceedings involving the Commission and PGE. In addition, AWEC has participated in numerous previous cases related to setting rates for PGE. Thus, AWEC possesses significant interest and expertise with respect to this proceeding. AWEC's participation will benefit all PGE industrial and large non-residential customers.

3. AWEC has been precertified under Articles 5.1 and 5.2 of the IFA and OAR § 860-001-0120(3)(b), as eligible to receive an Issue Fund Grant, by Commission Order No. 03-502, which was entered on August 21, 2003.

Therefore, AWEC respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount specified above.

Dated this 4th day of February, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

UE 370/UE 372

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	45	\$300	\$13,500
Attorney	30	\$245	\$7,350
Paralegal	10	\$170	\$1,700
<i>Expert Witness Fees</i>			
Expert	65	\$224	\$14,560
<i>Other Expenses</i>			
Travel			\$270
Printing and Postage			\$120
Subtotal			\$37,500
20% of AWEC Funded Expenditures			\$7,500
Total AWEC-PGE Issue Fund Grant Proposed Budget			\$30,000
Total AWEC Issue Fund Request			\$30,000