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July 21, 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:

Enclosed please find the Request for Final Payment of Issue Fund Grant and Confidential Exhibit A on behalf of the Alliance of Western Energy Consumers. Pursuant to Section 7.3 of the Intervenor Funding Agreement, Confidential Exhibit A is being submitted under seal to the Commission and Portland General Electric Company.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosures
cc: Doug Tingey

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 370, UE 372

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	REQUEST FOR FINAL PAYMENT OF
COMPANY,)	ISSUE 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 Section 7.3 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 requests final payment of AWEC’s Issue Fund Grant in Docket Nos. UE 370-372 in the amount of \$30,000.

On February 4, 2020, AWEC filed a Request for Issue Fund Grant and Proposed Budget in Docket Nos. UE 370-372, showing eligible expenses in the amount of \$37,500 and requesting an Issue Fund Grant in the amount of \$30,000. The Commission issued Order No. 20-039 on February 5, 2020, approving an Issue Fund Grant for AWEC in the amount of \$30,000. At this time, AWEC requests that the Commission authorize final payment of AWEC’s approved Issue Fund Grant in Docket Nos. UE 370-372 in the amount of \$30,000 from the 2020 PGE Issue Fund. AWEC’s expenses are shown in Confidential Exhibit A.

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This Request for Payment satisfies the requirements of the IFA as follows:

Section 7.3(a) – The itemized expenses, payees, and hourly rates are attached as Confidential Exhibit A.

Section 7.3(b) – AWEC has been an active participant in this Docket. AWEC reviewed the filings in this docket, conducted discovery, filed two rounds of testimony and a brief, and participated in settlement discussions. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC’s participation in UE 370-372.

Section 7.3(c) – The Commission approved AWEC’s proposed budget on February 5, 2020. In addition, AWEC used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA.

Section 7.3(d) - This Request for Payment constitutes a Final Request for Payment in this Docket.

Section 7.4 – All of the expenses included in Exhibit A are Eligible Expenses as defined in Section 7.4 of the IFA because they relate to services provided or expenses incurred by AWEC’s outside legal counsel and expert witnesses. Relevant non-privileged documents substantiating the Eligible Expenses in Confidential Exhibit A are available for Commission audit, if requested, pursuant to Section 7.10 of the IFA.

The IFA provides that the granting of an Issue Fund Grant “shall constitute a binding obligation on the Commission to order reimbursement of Eligible Expenses.” IFA § 6.5. Likewise, the intervenor funding rules adopted by the Commission provide that “[t]he terms of an [intervenor funding] agreement are binding on all organizations seeking a grant under that agreement and will be followed by the Commission in administering the agreement.” OAR § 860-001-0120(2). AWEC has satisfied the terms of the IFA and respectfully requests that the Commission approve final payment of AWEC’s Issue Fund Grant in the amount of \$30,000 from the 2020 PGE Issue Fund within 30 days of receiving this Request for Final Payment, as provided in Article 7.6 of the IFA.

PAGE 2 – AWEC REQUEST FOR FINAL PAYMENT OF ISSUE FUND GRANT

Checks should be made payable to:

Alliance of Western Energy Consumers

Payment should be sent to:

Alliance of Western Energy Consumers
c/o Tyler C. Pepple
Davison Van Cleve, P.C.
1750 SW Harbor Way, Suite 450
Portland, OR 97201

Dated this 21st day of July, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

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