

# Davison Van Cleve PC

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June 3, 2021

## *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,  
Detailed Depreciation Study of Electric Utility Properties.  
**Docket No. UM 2152**

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Notice of Intent to Request Issue Fund Grant and Proposed Budget in the above-referenced docket.

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  
UM 2152**

In the Matter of	)	NOTICE OF INTENT TO REQUEST
	)	ISSUE FUND GRANT AND PROPOSED
PORTLAND GENERAL ELECTRIC	)	BUDGET OF THE ALLIANCE OF
COMPANY,	)	WESTERN ENERGY CONSUMERS
	)	
Detailed Depreciation Study of Electric Utility	)	
Properties.	)	
_____	)	

The Alliance of Western Energy Consumers (“AWEC”) files this Notice of Intent to Request an Issue Fund Grant in Docket No. UM 2152, pursuant to OAR § 860-001-0120 and the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 18-020 (January 17, 2018).

1. On January 15, 2021, Portland General Electric Company (“PGE”) filed its Detailed Depreciation Study of Electric Utility Properties. The Commission docketed the filing as UM 2152.

2. Pursuant to Commission Order No. 21-150 (May 14, 2021), UM 2152 is an Eligible Proceeding for Issue Funds under Article 1(c)(v) of the IFA. Accordingly, an Issue Fund Grant may be made for this proceeding under the IFA.

3. Article 6.2 of the IFA requires an intervenor seeking an Issue Fund Grant to submit its Notice of Intent at the same time it files its Petition to Intervene. Because UM 2152 had not yet been designated an Eligible Proceeding for Issue Funds at the time of AWEC’s intervention, AWEC respectfully requests a waiver of this requirement.

4. As required by Article 6.2 of the IFA, this Notice of Intent is being served on each affected Participating Public Utility, all precertified organizations, and all parties identified on the service list for UM 2152.

5. AWEC identifies the PGE Issue Fund Account as the account from which AWEC intends to request the Issue Fund Grant.

6. 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.

7. Pursuant to Article 6.3 of the IFA, AWEC files this Proposed Budget in Docket No. UM 2152 (the “Proceeding”) and requests an Issue Fund Grant in the amount of \$15,000 from the 2021 PGE Issue Fund. If additional PGE Issue Funds become available, AWEC reserves the right to file an amended proposed budget and request an additional Issue Fund Grant. 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 UM 2152. AWEC will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in UM 2152, and plans to conduct discovery in this proceeding. In addition, AWEC will submit expert witness testimony and briefs as called for by the procedural schedule in this Docket.

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

AWEC intends to investigate numerous aspects of PGE's Detailed Depreciation Study of Electric Utility Properties, including its proposed depreciation curves, net salvage rates, proposed accelerated depreciation of its share of the Colstrip Generating Station, and any other issues identified during discovery. In addition, AWEC will review any other issues raised by PGE's filing or by other parties.

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

AWEC's participation will directly benefit industrial customers, 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 \$18,750 and is seeking an Issue Fund Grant in the amount of \$15,000. AWEC estimates that the amount currently available in the PGE Issue Fund Account for 2021 is \$120,140.

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

Attached as Exhibit A is AWEC's proposed budget in UM 2152.

**(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. AWEC's proposed budget assumes a fully litigated case. If the case is settled prior to hearing, actual expenses could be lower.

### **Basis for Request**

AWEC respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$15,000, based on the following considerations:

1. Any change in PGE's rates could substantially impact the rates PGE charges its customers, including AWEC's members, and warrants considerable scrutiny. 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 3rd day of June, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

UM 2152

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	20	\$300	\$6,000
Attorney	20	\$275	\$5,500
Paralegal	10	\$170	\$1,700
<i>Expert Witness Fees</i>			
Expert	22	\$250	\$5,500
<i>Other Expenses</i>			
Travel			\$50
Printing and Postage			\$0
Subtotal			\$18,750
20% of AWEC-Funded Expenditures			\$3,750
<b>Total AWEC-PGE Issue Fund Grant Proposed Budget</b>			<b>\$15,000</b>
<b>Total AWEC Issue Fund Request</b>			<b>\$15,000</b>