

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 394

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	OPENING BRIEF OF SMALL
	)	BUSINESS UTILITY ADVOCATES
Request for General Rate Revision	)	
_____	)	

Small Business Utility Advocates (“SBUA”) submits this Opening Brief to the Public Utility Commission of Oregon (“Commission”) pursuant to the January 6, 2022 Administrative Law Judge (“ALJ”) Ruling, updated on February 17, 2022, and on February 22, 2022.

SBUA is a nonprofit organization that represents, protects, and promotes the interests of small business utility customers. Participation in this docket was directed primarily at ensuring any rate change is just and reasonable to small businesses with focus on small nonresidential ratepayers who make up Portland General Electric Company’s Schedule 32 rate payer class.

SBUA filed to intervene in this docket on October 14, 2021, explicitly expressing no position regarding a first Partial Stipulation filed September 30, 2021 regarding cost of capital and cost of debt. SBUA’s petition to intervene was granted on October 20, 2021, and SBUA took no position on a second Partial Stipulation filed November 5, 2021, regarding standard rate case adjustments. After multiple settlement conferences, parties including SBUA reached agreement on a Third Partial Stipulation on January 18, 2022. That Stipulation dealt with issues regarding revenue requirement, decoupling, and other matters. After more settlement conferences, parties reached agreement on a Fourth Partial Stipulation filed by the Company on February 7, 2022

regarding rate spread and rate design. SBUA's expert is among those included in each Joint Testimony supporting the Third and the Fourth Partial Stipulations.

In this docket SBUA has focused its efforts and expert testimony on ensuring standard rate making process and results are fair and reasonable, pursuant to ORS 756.040. Focus of topics in SBUA's analysis and testimony included the cost of capital, cost of debt, revenue requirement, rate spread and rate design, and topics of decoupling, and treatment of deferrals especially any deferrals regarding the COVID-19 pandemic. The sole issue remaining for SBUA in this docket for SBUA is decoupling, resolved by the parties previously but now again before the Commission pursuant to the ALJ February 17, 2022 Ruling with regard to the intervention of Northwest Energy Coalition and National Resources Defense Council.

SBUA reserves its right to continue participation in this docket including with regard to the decoupling issue and any other issue that may arise and pertains to SBUA's testimony. Otherwise SBUA submits that the filed agreements in this docket are just and reasonable and conducted in good faith among the parties, and meet the fair and reasonable standard.

RESPECTFULLY SUBMITTED February 22, 2022

s/ Diane Henkels

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