

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 416

In the Matter of)	
)	
PORTLAND GENERAL)	ISSUES STATEMENT AND POSITION
ELECTRIC, Request for)	OF SMALL BUSINESS UTILITY
General Rate Revision)	ADVOCATES
)	

Pursuant to the docket schedule in the above-reference matter as set forth by the Administrative Law Judge, Small Business Utility Advocates, (“SBUA”), identifies its issues and position in this docket as follows:

1. Issues statement:

SBUA does not object to the Issues Statement proposed by Portland General Electric Company (“Company”) and other parties.

2. Position:

In this docket, SBUA is most concerned with a rate spread and rate design issue dealing with fair and reasonable treatment of distribution and transmission rates of the Schedule 32 customers and especially customers using >5000 kWh monthly.

Since May 3, 2023, SBUA has indicated in this docket SBUA’s concern for fair allocation of distribution of costs to the larger Schedule 32 small general service, a.k.a. small nonresidential or small commercial, consumers, and particularly those concerning the large increased distribution rate for small commercial customers consuming >5000 kWh. SBUA has been ready, willing, and able to participate in settlement discussion regarding rate spread and rate design and has made this known to the parties for the duration of the docket. SBUA participated in

scheduling emails on this topic. However, SBUA was not contacted timely and informed of the settlement discussion meeting on the topic and learned inadvertently, when SBUA inquired, on September 6, 2023 of a settlement discussion taking place that very day. SBUA's expert was unavailable that day; SBUA counsel on a limited basis and only in the afternoon discussion.

SBUA's concerns which were the scope of its focus may be resolved, however, we await responsive communication to confirm that.

Respectfully submitted,

September 15th, 2023.



s/ Diane Henkels

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