

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2276

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Approval of Justice Funding Precertification

**PORTLAND GENERAL
ELECTRIC COMPANY
COMMENTS ON APPLICATIONS FOR
PRE-CERTIFICATION JUSTICE
FUNDING**

Portland General Electric Company (PGE) submits these comments in response to the April 3, 2023, pre-certification justice funding requests from the Community Energy Project (CEP)¹, Coalition of Communities of Color (CCC)², Oregon Just Transition Alliance (OJTA)³, and Rogue Climate (RC).⁴

PGE does not oppose or object to the eligibility of any of the organizations for the pre-certification funding requested. However, PGE recommends that the Commission require the submission of additional information or include clarifications as part of its response to the pre-certification funding requests.

CEP seeks a total of \$101,547 split equally between PGE, PacifiCorp, and NW Natural pre-certification funds. PGE has no comments or objections to CEP's pre-certification request.

¹ UM 2276, Notice to Request HB 2475 Intervenor Funding Pre-certification of Community Energy Project, April 3rd 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAQ/um2276haq115348.pdf>

² UM 2276, Coalition of Community of Color's Notice of Intent to Request HB 2475 Intervenor Funding Pre-certification, April 3rd 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAQ/um2276haq155711.pdf>

³ UM 2276, Notice to Request HB 2375 Intervenor Funding Pre-certification of Oregon Just Transition Alliance, April 3rd 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAQ/um2276haq16427.pdf>

⁴ UM 2276, Rogue Climate's Application for Justice Funding Pre-certification Grant, April 3rd 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAQ/um2276haq16931.pdf>

CCC requests a total of \$65,500 in pre-certification funding. PGE does not question CCC's qualifications as an eligible recipient for pre-certification funding from PGE. PGE recommends that the Commission requests clarification from CCC regarding the allocation of pre-certification funding between the pre-certification funds for PGE, PacifiCorp and NW Natural.

OJTA applies for a total of \$100,000 with 25% funding from PGE's pre-certification fund. OJTA's Intervenor Funding Budget for 2023 includes \$40,000 for subgrants to member organizations. Eligible expenses include "[c]osts associated with subcontractors for eligible activities" and "[c]osts of contractors conducting activities that would otherwise constitute an eligible expense".⁵ PGE recommends that the Commission seek further information on the anticipated eligible activities that would be funded by subgrants to OJTA member organizations before approving OJTA funding requests for such amounts.

RC seeks a total of \$49,425 from PacifiCorp pre-certification fund. Given that RC's request is limited to PacifiCorp pre-certification funding, PGE requests the Commission clarify in any action regarding RC's application that pre-certification is limited to PacifiCorp matters. In the event RC seeks funding from PGE's pre-certification or case funds in the future, PGE believes the Commission and stakeholders should have the opportunity to evaluate RC's eligibility for funding at that time.

PGE looks forward to reviewing further pre-certification justice funding requests submitted to the Oregon Public Utility Commission by the extended deadline of April 17, 2023.⁶

⁵ OPUC Order 23-0333, Approval of Agreement for HB 2475 Intervenor Funding, February 8th, 2023, at Appendix A p20, available at: <https://apps.puc.state.or.us/orders/2023ords/23-033.pdf>

⁶ UM 2276, Memorandum, April 11th 2023, available at: <https://edocs.puc.state.or.us/efdocs/HDA/um2276hda91451.pdf>

Respectfully submitted this 17th day of April 2023.

PORTLAND GENERAL ELECTRIC
COMPANY



David F. White, OSB #011382
Managing Assistant General Counsel
121 SW Salmon Street, 1 WTC1301
Portland, OR 97204
Phone: 503.464.7701
Email: david.white@pgn.com