

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 435**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

Request for a General Rate Revision

VERDE'S NOTICE OF INTENT; REQUEST  
FOR JUSTICE FUNDING CASE FUND  
GRANT; AND PROPOSED BUDGET

Pursuant to HB 2475 (ORS 757.072), OAR 860-001-0800, and the Justice Funding Agreement (Agreement) adopted by the Public Utility Commission (Commission) in UM 2211 by Order 23-033 (February 7, 2023), Verde files this Notice of Intent, Request for Justice Funding Case Fund Grant and Proposed Budget in this matter. Verde seeks a grant in the amount of \$ 113,334 from Portland General Electric's (PGE) Justice Funding Case Fund and also asks that PGE be directed to provide 50% of the award to Verde, an up-front payment pursuant to OAR 860-001-0890 and Section 7.2 of the Agreement and states the following in support.<sup>1</sup>

Pursuant to Article 6 of the Agreement, setting forth the criteria for eligibility for case fund grants, this application, (a) demonstrates that Verde meets the eligibility criteria set forth Section 6.1; (b) demonstrates that this matter is an Eligible Proceedings as set forth in Section

6.2; and (c) proposes a reasonable scope of work and budget.

### **UE 435 Is an Eligible Proceeding**

Portland General Electric (PGE) filed a Request for a General Rate Revision which is the subject of this docket, UE 435. UE 435 is an Eligible Proceeding for Case Funds because it is a “contested case proceeding (*e.g.* rate cases) listed in section 6.2 and it is not a complaint proceeding.

### **Verde is an Eligible Organization.**

Verde represent low-income residential customers (low-income customers) or Environmental Justice Communities (EJ community) and Verde’s participation will be primarily directed toward issues affecting those interests. Verde is a 501(c)(3) non-profit organization and has been found Eligible by the Commission under HB 2475 in Orders 22-043 and 23-485 and the terms of the funding agreement explicitly lists Verde as an entity eligible for funding.

Verde represents low-income customers and environmental justice communities in PGE’s service area and has effectively represented them in numerous proceedings including, among others: UM 2211 - Implementation of HB 2475; UM 2225 - HB 2021 Investigation into Clean Energy Plans; and UM 1158 - Equity Metrics for Energy Trust of Oregon (HB 3141).

Verde will continue to develop advocacy positions benefitting these communities through Verde’s day to day interaction with its clients, while administering its projects and through targeted outreach or outreach through its work in coalition with other energy justice advocacy groups.

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<sup>1</sup> Recently, the Intervenor Funding Summary listed \$113,334 as available funding in PGE’s Justice Case Fund.

## **Scope of Work and Proposed Budget**

An additional increase in PGE's rates could substantially impact environmental justice communities and this case, especially given the rate hike recently approved in PGE's General Rate Case in UE 416. The scope of the request and timing raises important questions of policy and fact. Verde intends to assess the reasonableness of PGE's request, examine all issue relevant to the requested rate increase, rate spread and methods to mitigate or avoid impacts to environmental justice communities and will evaluate issues raised by other parties to the proceeding. Verde believes its participation will benefit low-income and frontline communities, and foster further involvement in PUC regulatory proceedings, particularly rate cases, by members of and other organizations serving environmental justice communities, fulfilling the intent of HB 2475.

### **A. Scope of Work**

Verde had been tracking its participation in this proceeding to date and intends to continue to participate in most procedural aspects, including workshops, settlement meetings and hearings. Verde will review, evaluate, and investigate the testimony and briefs filed. Verde will conduct investigations and research when needed; file testimony; and participate in numerous settlement conferences. Verde may seek discovery through data requests and will otherwise review the responses received by the parties. Verde will focus on issues directly related to EJ communities.

Verde will be represented through its staffs' participation and by attorneys, Tonia Moro, and Carra Sahler, and other legal staff at Green Energy Institute. Verde intends to consult and potentially provide testimony from an expert in consumer protection and in bill-discount, low-income-energy-efficiency, low-income rate class, and/or disconnection and arrearages

management rate/program design or an expert in economics or finance to address issues related to the cost of capital and the use of Power Purchase Agreements and third-party generation.

**B. Eligible Expenses/Budget<sup>1</sup>**

<b>Employee/Consultant</b>	<b>Rate</b>	<b>Hours</b>	<b>Total</b>
Energy Justice Coordinator	100	40	4,000
Counsel Tonia Moro	300	100	30,000
Consultant/Expert			11,000
			<b>45,000</b>

Verde seeks a Case Fund Grant from PGE’s Case Fund and estimates that the amount currently available in the PGE Justice Case Funs is over \$ 100,000. Verde’s request for case certification and participation in this docket will not unreasonably delay the proceedings as the deadline for filing a budget for funding is June 11, 2024.

**Request for partial up-front Payment**

Pursuant to Order No. 23-033 (approving Environmental Justice Funding Agreement for HB 2475 Intervenor Funding), Section 7 of the Environmental Justice Communities Funding  
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<sup>1</sup> Verde anticipates using some of its Pre-Certified Funds to complete some of the anticipated work but this case fund grant is need to support the more technical and time-consuming work required in a general rate case.

Agreement and OAR 860-001-0890(5), Verde also requests a pre-completion partial payment of the case fund grant awarded pursuant to Order No. 24-072 in the amount of \$22,500.

Respectfully submitted this 17<sup>th</sup> Day of May, 2024.

*/s/Tonia L. Moro*

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