

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com
107 SE Washington St., Suite 430
Portland, OR 97214

March 25, 2024

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,
2025 Annual Power Cost Update Tariff
Docket No. UE 436

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Proposed Budget for Issue Fund Grant in the above-referenced docket.

Thank you for your assistance. Please do not hesitate to call if you have any questions.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 436

In the Matter of)	PROPOSED BUDGET FOR ISSUE
)	FUND GRANT OF THE ALLIANCE OF
PORTLAND GENERAL ELECTRIC)	WESTERN ENERGY CONSUMERS
COMPANY,)	
)	
2025 Annual Power Cost Update Tariff.)	
_____)	

Pursuant to Article 6.3 of the Fifth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 22-506 (Dec. 29, 2022), the Alliance of Western Energy Consumers (“AWEC”) files this Proposed Budget in Docket No. UE 436 (the “Proceeding”) and Request for an Issue Fund Grant in the amount of \$25,535 from the 2024 Portland General Electric (“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 make best efforts to 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 UE 436. AWEC will attend all clarifying sessions, workshops, public meetings, oral presentations, and hearings in UE 436, 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 Annual Power Cost Update, including PGE's power costs, transmission costs, 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 \$31,918.75 and is seeking an Issue Fund Grant in the amount of \$25,535. AWEC estimates that the amount currently available in the PGE Issue Fund Account for 2024 is \$170,272.39.

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

Attached as Exhibit A is AWEC's proposed budget in UE 436.

(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 \$25,535, 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 25th day of March, 2024.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

107 SE Washington St., Suite 430

Portland, OR 97214

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Attorney for the Alliance of Western Energy Consumers

UE 436

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Partner	22	\$325	\$7,150
Attorney	22	\$275	\$6,050
Paralegal	20	\$200	\$4,000
<i>Expert Witness Fees</i>			
Expert	60	\$244	\$14,640
<i>Other Expenses</i>			
Travel			\$50
Printing and Postage			\$28.75
Subtotal			\$31,918.75
20% of AWEC-Funded Expenditures			\$6,383.75
Total AWEC-PGE Issue Fund Grant Proposed Budget			\$25,535
Total AWEC Issue Fund Request			\$25,535