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April 8, 2019

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,
2020 Annual Power Cost Update Tariff
Docket No. UE 359

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' *Notice of Intent to Request Issue Fund Grant* and *Request for Issue Fund Grant and Proposed Budget* in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 359

In the Matter of)	NOTICE OF INTENT TO REQUEST
)	ISSUE FUND GRANT and REQUEST
PORTLAND GENERAL ELECTRIC)	FOR ISSUE FUND GRANT AND
COMPANY,)	PROPOSED BUDGET OF THE
)	ALLIANCE OF WESTERN ENERGY
2020 Annual Power Cost Update Mechanism.)	CONSUMERS
_____)	

The Alliance of Western Energy Consumers (“AWEC”) files this Notice of Intent to Request an Issue Fund Grant in Docket No. UE 359, pursuant to OAR § 860-001-0120 and the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 18-020 (January 17, 2018).

1. On April 1, 2019, Portland General Electric Company (“PGE” or the “Company”) filed its Annual Power Cost Update Tariff (“AUT”). The Commission docketed the filing as UE 359.
2. UE 359 is an Eligible Proceeding for Issue Funds under Article 6.1(c) of the IFA. Accordingly, an Issue Fund Grant may be made for this proceeding under the IFA.
3. As required by Article 6.2 of the IFA, AWEC is filing this Notice of Intent at the time it files its Petition to Intervene this Docket.
4. As required by Article 6.2 of the IFA, this Notice of Intent is being served on each affected Participating Public Utility, all precertified organizations, and all parties identified on the service list for UE 359.

5. AWEC identifies the PGE Issue Fund Account as the account from which AWEC intends to request the Issue Fund Grant.

6. 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.

7. Pursuant to Article 6.3 of the IFA, AWEC files this Proposed Budget in Docket No. UE 359 (the “Proceeding”) for an Issue Fund Grant in the amount of \$50,000. 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 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 359. AWEC will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in UE 359, 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 AUT, including PGE’s power costs, transmission costs, participation in the Western Energy Imbalance Market, 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 \$62,500 and is seeking an Issue Fund Grant in the amount of \$50,000. AWEC estimates that the amount currently available in the PGE Issue Fund Account for 2019 is \$145,122.8.

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

Attached as Exhibit A is AWEC's proposed budget in UE 359.

(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 \$50,000, based on the following considerations:

1. Any change in how PGE's power and transmission costs are passed along to customers could substantially impact the rates paid by 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 8th day of April, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

UE 359

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	90	\$280	\$25,200
Attorney	40	\$225	\$9,000
Paralegal	17	\$170	\$2,890
<i>Expert Witness Fees</i>			
Expert	112	\$224	\$25,088
<i>Other Expenses</i>			
Travel			\$290
Printing and Postage			\$32
Subtotal			\$62,500
20% of AWEC Funded Expenditures			\$12,500
Total AWEC PGE Issue Fund Grant Proposed Budget			\$50,000
Total AWEC Issue Fund Request			\$50,000