# Davison Van Cleve PC

## Attorneys at Law

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December 10, 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,

Renewable Resource Automatic Adjustment Clause (Schedule 122).

Docket No. UE 370

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Notice of Intent to Request Issue Fund Grant 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 370**

In the Matter of	<ul><li>) NOTICE OF INTENT TO REQUEST</li><li>) ISSUE FUND GRANT OF THE</li></ul>
PORTLAND GENERAL ELECTRIC COMPANY,	) ALLIANCE OF WESTERN ENERGY ) CONSUMERS
Renewable Resource Automatic Adjustment	)
Clause (Schedule 122).	) )

The Alliance of Western Energy Consumers ("AWEC") files this Notice of Intent to Request an Issue Fund Grant in Docket No. UE 370, 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 December 3, 2019, Portland General Electric Company ("PGE" or the "Company") filed its Renewable Resource Automatic Adjustment Clause, which includes proposed revisions to the Company's Schedule 122. The Commission docketed the filing as UE 370.
- 2. As argued in AWEC's motion that is being filed concurrently with this Notice of Intent, UE 370 is an Eligible Proceeding for Issue Funds under Article 1(c)(v) of the IFA. The IFA defines an Eligible Proceeding for Issue Funds as, among other things, any "proceeding ... that directly affects one or more of the Participating Utilities and is anticipated to have a substantial impact on utility rates or service, a significant impact on utility customers or the operations of the utility, is likely to result in a significant change in regulatory policy, or

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raises novel questions of fact or law." IFA, Article 1(c)(v). UE 370 will directly affect PGE, which is a Participating Public Utility under Article 1(n) of the IFA. UE 370 may also result in a significant change in regulatory policy and raises novel questions of fact and law. Accordingly, an Issue Fund Grant may be made for this proceeding under Article 6.1 the IFA.

- 3. 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 370.
- 4. AWEC identifies the 2020 PGE Issue Fund Account as the account from which AWEC intends to request the Issue Fund Grant.
- 5. 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.

Dated this 10th day of December, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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