

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UE 370, UE 372**

|  |   |                          |
|--|---|--------------------------|
| In the Matter of   | ) |                          |
|  | ) | CUB REQUEST FOR AN ISSUE |
| PORTLAND GENERAL ELECTRIC COMPANY,   | ) | FUND GRANT & PROPOSED    |
|  | ) | BUDGET                   |
|  | ) |                          |
| Renewable Resources Automatic Adjustment Clause (Sched 122) (WHEATRIDGE) (UE 370) and  | ) |                          |
|  | ) |                          |
| Renewable Resource Automatic Adjustment Clause (Schedule 122) (BPSC Energy Storage Microgrid and ARC Energy Storage) (UE 372). | ) |                          |
|  | ) |                          |
| <hr style="width: 100%;"/>   | ) |                          |

The Oregon Citizens' Utility Board (“CUB”) requests a grant of \$30,000.00 from the 2020 Portland General Electric Company (“PGE”) Issue Fund. CUB has been tracking its participation in this docket by hours and activity.

CUB is pre-certified per OAR 860-012-0100(3)(a). UE 370 is an eligible proceeding under the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), as approved by the Oregon Public Utility Commission in Order No. 18-017, entered January 17, 2018. The proceeding directly affects PGE, which is a participating public utility under the IFA. *See* IFA at Article 1(n). The IFA defines an Eligible Proceeding for Issue Funds as “v. any other proceeding so designated by the Commission 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 raises novel questions of fact or law; thus, an Issue Fund Grant may be

made for this proceeding under Article 6.1 of the IFA.

Article 6.2 of the IFA requires an intervenor seeking an Issue Fund Grant to file a Notice of Intent to Request an Issue Fund Grant. CUB filed its Notice of Intent to Request an Issue Fund Grant concurrent on January 31, 2020, as required by the IFA (Article 6.2).

Article 6.3 of the IFA requires an intervenor seeking an Issue Fund Grant to file a proposed budget within 30 days after the prehearing conference at which the schedule for the proceeding is established. The prehearing conference in this docket was held on January 16, 2020.

Pursuant to paragraph 6.3 of the IFA, the proposed budget must identify certain points of information. CUB provides the information below.

*(a) Statement of Work to Be Performed:* CUB intends to participate in every procedural aspect of this case. CUB participated in the prehearing conference and will participate in all workshops and settlement meetings. CUB will also attend and participate in the hearing scheduled for this docket. CUB has reviewed and analyzed the testimony and briefs filed in this docket, and will review the briefs yet to be filed. We have pursued discovery of PGE through data requests and we will respond to data requests asked of us. We will file testimony and briefs, and we will participate in the scheduled hearings in this docket.

*(b) Description of Areas to Be Investigated:* CUB is investigating issues including, but not limited to:

- i. Investigating whether the costs associated with the Wheatridge generating facility, BPSC Energy Storage Microgrid, and ARC Energy Storage Facility were prudently incurred.
- ii. Investigating whether the energy storage projects considered herein are eligible

for recovery in PGE's Schedule 122 Renewable Adjustment Clause ("RAC").

- iii. Investigating PGE's proposed treatment for the sale of Renewable Energy Credits ("RECs").
- iv. Investigating all other issues raised by other parties during this proceeding.

*(c) Description of the Class or Classes Benefiting from CUB's Participation:*

CUB represents the interests of PGE's residential customers, though other customer classes may benefit from many aspects of our participation.

*(d) The Fund from Which CUB Seeks an Issue Fund Grant & Available Funds:* CUB is seeking a \$30,000.00 grant from the 2020 PGE Issue Fund.

*(e) The Budget Showing Estimated Fees and Costs:* CUB's budget accompanies this document as Attachment A.

*(f) A Representation of the Use of Matching Funds:* The budget and an accounting for the use of matching funds accompany this document as Attachment A.

Dated this 7<sup>th</sup> February 2020.

Respectfully submitted,



Bob Jenks  
Executive Director  
Oregon Citizens' Utility Board of Oregon

# Attachment A

## CUB Proposed Budget -- UE 370, UE 372

| <b>CUB Internal Expenses</b>   | <b>Rate</b> | <b>Hours</b> | <b>Cost</b>     |
|--------------------------------|-------------|--------------|-----------------|
| <i>Staff</i>                   |             |              |                 |
| Bob Jenks, Executive Director  | \$275       | 19.00        | \$5,225.00      |
| Michael Goetz, General Counsel | \$250       | 55.00        | \$13,750.00     |
| Essie Bender, Office Manager   | \$100       | 4.50         | \$450.00        |
| Will Gehrke, Economist         | \$225       | 70.00        | \$15,750.00     |
| Sudeshna Pal, Economist        | \$200       | 7.75         | \$1,550.00      |
| Jack Watson, Legal Intern      | \$130       | 6.00         | \$780.00        |
| <i>Other Expenses</i>          |             |              |                 |
| Travel                         |             |              |                 |
| <b>SubTotal</b>                |             |              | \$37,505.00     |
| <hr/>                          |             |              |                 |
| <b>In-House Resources</b>      |             |              |                 |
| <hr/>                          |             |              |                 |
| 20% of Eligible Expenses       |             |              | \$7,501         |
| <b>Total</b>                   |             |              | <b>\$30,004</b> |