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November 15, 2021

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,
Request for a General Rate Revision.
Docket No. UE 394

Dear Filing Center:

Enclosed please find the Request for Partial Payment of Issue Fund Grant and Confidential Exhibit A on behalf of the Alliance of Western Energy Consumers. Confidential Exhibit A will be transmitted electronically to the Commission and Portland General Electric Company and will be encrypted with 7-zip software.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosures
cc: Loretta Mabinton
Jay Tinker

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 394

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	REQUEST FOR PARTIAL PAYMENT
COMPANY,)	OF ISSUE FUND GRANT OF THE
)	ALLIANCE OF WESTERN ENERGY
Request for a General Rate Revision.)	CONSUMERS
_____)	

Pursuant to Section 7.3 of the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) in Order No. 18-017 (January 17, 2018), the Alliance of Western Energy Consumers (“AWEC”) hereby requests partial payment of AWEC’s Issue Fund Grant in Docket No. UE 394 in the amount of \$49,564.26.

On August 2, 2021, AWEC filed a Request for Issue Fund Grant and Proposed Budget in Docket No. UE 394 in the amount of \$40,000. On September 9, 2021, the Commission approved an Issue Fund Grant for AWEC in the amount of \$30,000 by Order No. 21-276. On November 15, 2021, AWEC filed a Request for Amendment of Proposed Budget, showing eligible expenses of \$87,500 and seeking a new Issue Fund Grant in the amount of \$70,000. AWEC’s request is pending.

At this time, and subject to approval of AWEC’s Request for Amendment of Proposed Budget, AWEC requests that the Commission authorize partial payment of AWEC’s Issue Fund Grant in Docket No. UE 394 in the amount of \$49,564.26. In accordance with AWEC’s proposed budgets, AWEC requests that this amount be funded as follows: \$40,000

from the 2021 PGE Issue Fund, and \$9,564.26 from the 2022 PGE Issue Fund. AWEC's expenses are shown in Confidential Exhibit A.

This Request for Payment satisfies the requirements of the IFA as follows:

Section 7.3(a) – The itemized expenses, payees, and hourly rates are attached as Confidential Exhibit A.

Section 7.3(b) – AWEC has been an active participant in this Docket. AWEC reviewed the filings in this docket, conducted discovery, participated in settlement discussions, and filed testimony in this Docket. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC's participation in UE 394.

Section 7.3(c) – The Commission approved AWEC's initial proposed budget on September 9, 2021. AWEC is awaiting a decision on its amended proposed budget filed on November 15, 2021. In addition, AWEC used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA.

Section 7.3(d) - This Request for Payment constitutes a Partial Request for Payment in this Docket.

Section 7.4 – All of the expenses included in Exhibit A are Eligible Expenses as defined in Section 7.4 of the IFA because they relate to services provided or expenses incurred by AWEC's outside legal counsel and expert witnesses. Relevant non-privileged documents substantiating the Eligible Expenses in Confidential Exhibit A are available for Commission audit, if requested, pursuant to Section 7.10 of the IFA.

The IFA provides that the granting of an Issue Fund Grant “shall constitute a binding obligation on the Commission to order reimbursement of Eligible Expenses.” IFA § 6.5. Likewise, the intervenor funding rules adopted by the Commission provide that “[t]he terms of an [intervenor funding] agreement are binding on all organizations seeking a grant under that agreement and will be followed by the Commission in administering the agreement.” OAR § 860-001-0120(2). AWEC has satisfied the terms of the IFA and respectfully requests

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that the Commission approve partial payment of AWEC's Issue Fund Grant in the amount of \$49,564.26 in the manner described above within 30 days of receiving this Request for Partial Payment, as provided in Article 7.6 of the IFA.

Checks should be made payable to:

Alliance of Western Energy Consumers

Payment should be sent to:

Alliance of Western Energy Consumers
c/o Tyler C. Pepple
Davison Van Cleve, P.C.
1750 SW Harbor Way, Suite 450
Portland, OR 97201

Dated this 15th day of November, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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