

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 394

| | | |
|--------------------------------------|---|--------------------------|
| In the Matter of |) | |
| |) | |
| PORTLAND GENERAL ELECTRIC |) | CUB REQUEST FOR AN ISSUE |
| COMPANY, |) | FUND GRANT & PROPOSED |
| |) | BUDGET |
| |) | |
| Request for a General Rate Revision. |) | |
| _____ |) | |

The Oregon Citizens' Utility Board (“CUB”) requests a grant of \$41,250 from the 2021 Portland General Electric 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 394 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 Portland General Electric, 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 “i. general rate case request” IFA, Article 1(c). UE 394 is Portland General Electric’s Request for a General Rate Revision; 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 and Issue Fund Grant to file a Notice of Intent to Request and Issue Fund Grant. CUB filed its Notice of Intent to Request an Issue Fund Grant on July 12th, 2020, as required by the IFA (Article 6.2).

Article 6.3 of the IFA requires an intervenor seeking and Issue Fund Grant to file a

proposed budget within 30 days after the prehearing conference at which the schedule for the proceeding is established.

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 will participate 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 will review and analyze the testimony filed in this docket and will review the briefs yet to be filed. We will pursue discovery of Portland General Electric through data requests and we will respond to data requests asked of us. We will file testimony and briefs.

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

- i. Review the IOS and other capital investments included in this general rate request to determine whether they were prudently incurred.
- ii. Review any policy items, including the reasonableness of the company's use of customer deposits,
- iii. Look at the impact of the closure of Colstrip and accelerated depreciation of Colstrip.
- iv. Examine issues related to rate spread and rate design, including any changes to the residential basic charge, and
- v. Examine all other issues raised by other parties to this proceeding.

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

CUB represents the interests of Portland General Electric'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 \$41,250 grant from the 2021 Portland General Electric Issue Fund. CUB respectfully requests that the Commission approve CUB's request for a \$41,250 grant from the 2021 Portland General Electric 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 27th day of July, 2021.

Respectfully submitted,



Michael P. Goetz, OSB #141465
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Attachment A

CUB Proposed Budget -- UE 394

| CUB Internal Expenses | Rate | Hours | Cost |
|---------------------------------|-------------|--------------|-----------------|
| <i>Staff</i> | | | |
| Bob Jenks, Executive Director | \$325 | 40.00 | \$13,000.00 |
| Michael Goetz, General Counsel | \$300 | 50.00 | \$15,000.00 |
| Thomas Jerin, Office Manager | \$150 | 2.75 | \$412.50 |
| Will Gehrke, Economist | \$175 | 62.00 | \$10,850.00 |
| Sudeshna Pal, Economist | \$250 | 42.00 | \$10,500.00 |
| Jacqueline Dewart, Legal Intern | \$180 | 10.00 | \$1,800.00 |
| <i>Other Expenses</i> | | | |
| Travel | | | |
| SubTotal | | | \$51,562.50 |
| <hr/> | | | |
| In-House Resources | | | |
| 20% of Eligible Expenses | | | \$10,313 |
| Total | | | \$41,250 |