

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 416

IN THE MATTER OF:)	
)	
PORTLAND GENERAL ELECTRIC)	PROPOSED BUDGET
COMPANY)	OF SMALL BUSINESS
Request for General Rate Revision; and)	UTILITY ADVOCATES
2024 Annual Power Cost Update)	
_____)	

1. INTRODUCTION

Pursuant to Chief Administrative Law Judge October 4, 2023 Ruling, Small Business Utility Advocates Oregon (“SBUA”) submits this Proposed Budget and Exhibit A (“Proposed Budget”) for approval by the Public Utility Commission of Oregon (“Commission”). This Proposed Budget is consistent with Chief ALJ March 10, 2023 Memorandum, page 5, in this docket, ORS 757.072, OAR 860-001-0120, and Issue Fund-Case Certified account Articles 4.2, 5.1, and 6.3 of the Fifth Restated and Amended Intervenor Funding Agreement approved December 29, 2022 by the Commission in Order 22-506 (“Fifth IFA”). SBUA petitioned for intervention on March 7, 2023.

2. REQUIREMENTS FOR AN ISSUE FUND GRANT PROPOSED BUDGET

The Proposed Budget must include: (a) a statement of work to be performed by the applicant for which the applicant is seeking an Issue Fund Grant; (b) a description of the areas to be investigated by the intervenor; (c) a description of the particular customer class or classes that will benefit from the intervenor's participation; (d) identification of the specific account or accounts from which the intervenor is seeking an Issue Fund Grant and an estimate of the amount

of available funds in that account; (e) a budget showing estimated attorney fees, which may include the cost for appropriate support staff and operational support; (f) a budget showing estimated consultant fees and expert witness fees, which may include the cost for appropriate support staff and operational support; and (g) a representation that the intervenor will use matching funds in the form of either in-house resources or outside funding to account for or pay at least 20% of the Eligible Expenses for the work to be performed for which the intervenor is seeking an Issue Fund Grant. Fifth IFA Article 6.3.

(a) A statement of work to be performed by the applicant for which the applicant is seeking an Issue Fund Grant.

SBUA represents small business including small general service a.k.a. small commercial customers in this docket, that is, Portland General Electric Company (“Company”) Schedule 32 ratepayers to ensure fair and reasonable rates for these ratepayers. SBUA has reviewed and analyzed data, and attended and participated in events identified in the Administrative Law Judge (“ALJ”) March 13, 2023 Procedural Conference Memorandum including participating in preconference, workshops, settlement conferences, discovery through data requests, providing technical input and testimony. SBUA’s intervention was granted on March 8, 2023 and has been assisted by expert Danny Kermode-CPA retired.

(b) A description of the areas to be investigated by the applicant.

To ensure fair and reasonable rates for Schedule 32 customers, SBUA tracked this case since the Company’s initial utility filing on March 15, 2023. SBUA expert focused on the justification for the base change of 12.6% on small nonresidential customers (Schedule 32) including opening testimony and particularly on rate spread and rate design to ensure fair and reasonable

rates. SBUA's expert identified a significant increase in distribution charges for Schedule 32 customers using over 5000 kWh, presented analysis of why such increase is not fair and reasonable, including why it is unreasonable to base this increase on facilitating graduation to a higher rate schedule. SBUA also ensured compliance with Commission Order 20-065 ensuring that the public comment of small commercial ratepayers and other small businesses are included in the Record of this rate case.

(c) A description of the particular customer class or classes that will benefit from the intervenor's participation.

The particular customer class that would benefit from SBUA's participating in the proceeding is the Schedule 32 General Service — Small Nonresidential.

(d) Identification of the specific account or accounts from which the intervenor is seeking an Issue Fund Grant and an estimate of the amount of available funds in each account.

The accounts from which SBUA seeks Issue Fund grant funds — Case-Certified Account is from Portland General Electric: \$10,000

(e), (f), and (g) require a budget showing estimated attorney fees, which may include the cost for appropriate support staff and operational support, a budget showing estimated consultant fees and expert witness fees, which may include the cost for appropriate support staff and operational support, and a representation that the intervenor will use matching funds in the form of either in-house resources or outside funding to account for or pay at least 20% of the Eligible Expenses for the work to be performed for which the intervenor is seeking an Issue Fund Grant.

In response to these requirements “e”, “f”, and “g”, SBUA submits the attached UE 416 Proposed Budget of SBUA Exhibit A as a Budget for the Issue Fund Grant requested.

SBUA represents SBUA will use matching funds in the form of either SBUA in-house resources or outside funding to account for or pay at least 20% of the Eligible Expenses for the work to be performed for which the intervenor is seeking an Issue Fund Grant.

3. CONCLUSION

SBUA submits the information above and the attached to support its request that the Commission approve SBUA’s Proposed Budget to represent the Company’s small commercial customers in this general rate case.

Respectfully submitted: October 9, 2023



s/ Diane Henkels

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EXHIBIT A

SBUA Proposed Budget for Case Certified Funds Grant

Personnel	Hours	Rate	Cost
Expert (Kermode)	49	\$150	\$7,350
Technical assistant/paralegal	3	\$50	\$150
Executive Director	4	\$200	\$800
Attorney	10	\$250	\$2,500
Subtotal			\$10,800
20% of SBUA Funded Expenditures			\$2,160
Total SBUA Issue Fund Grant-Case Certified Request			\$8,640