

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1856

In the Matter of)	
)	CUB REQUEST FOR AN ISSUE
PORTLAND GENERAL ELECTRIC)	FUND GRANT &
COMPANY, Draft Storage Potential)	PROPOSED BUDGET
Evaluation.)	
_____)	

The Oregon Citizens' Utility Board (“CUB”) estimates eligible expenses of \$25,000, before the 20% match, and requests a grant of \$20,000 from the 2018 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). UM 1856 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 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, [or] is likely to result in a significant change in regulatory policy. . .” IFA, Article 1(c). UM 1856 is likely to have a substantial impact on PGE’s rates and service, and therefore on customers represented by CUB and served by PGE. 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 at the time it files its intervention. At the time CUB filed its petition to intervene in this Docket, on July 21,2017, the current IFA had not yet been negotiated

between the parties or approved by the Commission. CUB filed its Notice of Intent to Request an Issue Fund Grant on March 20, 2018, as required by the IFA (Article 6.2). Accordingly, CUB respectfully requests a waiver of this noticing requirement.

Article 6.3 of the IFA requires an intervenor seeking an Issue Fund Grant 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 November 30, 2017. Again, the current IFA had not yet been approved by the Commission by the 30-day deadline for submitting proposed budgets. CUB respectfully requests a waiver of this requirement as well.

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 pre-hearing conference. We will attend, either in person or by phone, and participate in all or most workshops, settlement meetings, hearings, and any Commission presentations. We will review and analyze PGE's testimony and briefs. We will review and analyze testimony and briefs filed by other parties. We will pursue discovery of PGE through data requests, and we will respond to data requests asked of us. We will file testimony and briefs, and present our recommendations to the Commission, including any proposed modifications or conditions.

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

- i. Whether PGE's storage proposals are consistent with PUC rules and guidelines;
- ii. Whether the details, such as the length and size and technology of each project, make sense;
- iii. Whether the Renewable Resources Automatic Adjustment Clause is an appropriate way to recover costs.

(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 \$20,000 grant from the 2018 PGE Issue Fund. CUB's budget shows eligible expenses of \$25,000, but CUB limits its request in this case to \$20,000. CUB respectfully requests that the Commission approve CUB's request for a \$20,000 grant from the 2018 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 26th day of March, 2018.

Respectfully submitted,



Bob Jenks
Executive Director
Oregon Citizens' Utility Board

CUB Proposed Budget -- UM 1856

CUB Internal Expenses	Rate	Hours	Cost
<i>Staff</i>			
Bob Jenks, Executive Director	\$250	25.00	\$6,250.00
Michael Goetz, Staff Attorney	\$225	30.00	\$6,750.00
Sarah Ryan-Knox, Paralegal	\$100	15.00	\$1,500.00
Will Gehrke, Economist	\$200	41.00	\$8,200.00
Legal Clerk	\$75	30.00	\$2,250.00
<i>Other Expenses</i>			
Printing, Mailing & Travel			\$50.00
<hr/>			
In-House Resources			
20% of Eligible Expenses			(\$5,000)
Total			\$20,000