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December 10, 2019

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,
Renewable Resource Automatic Adjustment Clause (Schedule 122).
Docket No. UE 370

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Motion to Designate Proceeding as Eligible for Issue Funds in the above-referenced docket.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 370

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	ALLIANCE OF WESTERN ENERGY
COMPANY,)	CONSUMERS' MOTION TO
)	DESIGNATE PROCEEDING AS
Renewable Resource Automatic)	ELIGIBLE FOR ISSUE FUNDS
Adjustment Clause (Schedule 122).)	
_____)	

Pursuant to Section 1(c)(v) of the Fourth Amended Intervenor Funding Agreement (“IFA”), approved on January 17, 2018 by the Oregon Public Utility Commission (“Commission”) in Order No. 18-017, and the Chief Administrative Law Judge’s February 12, 2018 Ruling in Docket No. UM 1909, the Alliance of Western Energy Consumers (“AWEC”) files this motion to designate the above-referenced docket as eligible for an Issue Fund Grant. AWEC has conferred with the Oregon Citizens’ Utility Board, which supports this motion.

Section 1(c)(v) of the IFA defines “Eligible Proceeding for Issue Funds” as, among other things, a 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 question of fact or law.”

Portland General Electric (“PGE”) is one of the “Participating Utilities” in the IFA.^{1/}

^{1/} IFA, Article 1(n) (Jan 1, 2018).

Additionally, PGE’s application will have a substantial impact on utility rates and on PGE’s customers. The application in this docket is a Renewable Adjustment Clause (“RAC”) filing to include the costs of the Wheatridge Energy Facility (“Wheatridge”) in customer rates. PGE estimates that inclusion of Wheatridge in customer rates will increase revenue requirement by \$26.5 million annually.^{2/} Additionally, PGE’s filing raises significant regulatory policy issues. This includes the prudence of the Company’s decision to acquire Wheatridge, the prudence of PGE’s proposal to monetize renewable energy certificates for the benefit of customers to reduce the near-term cost of Wheatridge – a proposal the Commission has never before ruled on – and PGE’s proposal to make several modifications to its RAC tariff, which was developed pursuant to a stipulation AWEC’s predecessor, the Industrial Customers of Northwest Utilities, was a party to. PGE’s proposed revisions to its RAC tariff also appear to implicate the Commission’s recent decision in UM 1909 that it lacked the legal authority to authorize deferrals of capital costs.^{3/} AWEC intends to investigate each of these issues, as well as others that arise during the course of its review of the Company’s application.

Therefore, for the foregoing reasons, AWEC respectfully moves the Commission to designate this proceeding as an “Eligible Proceeding for Issue Funds” under the IFA.

Dated this 10th day of December, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

^{2/} PGE/100, Armstrong-Batzler/2:11.

^{3/} See PGE/200.

/s/ Tyler C. Pepple

Tyler C. Pepple

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