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March 15, 2022

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: PACIFICORP, dba PACIFIC POWER,
Multi-State Process Fourth Amended and Restated Intervenor Funding
Agreement.
Docket No. UM 1586

Dear Filing Center:

Please find enclosed for filing the Request for MSP Fund Grant and Proposed
Budget of the Alliance of Western Energy Consumers.

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**

UM 1586

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER)	REQUEST FOR MSP FUND GRANT
)	AND PROPOSED BUDGET
Multi-State Process Fourth Amended and)	OF THE ALLIANCE OF WESTERN
Restated Intervenor Funding Agreement.)	ENERGY CONSUMERS
_____)	

Pursuant to Section 5.1 of the Multi-State Process (“MSP”) Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), the Alliance of Western Energy Consumers (“AWEC”) files this Proposed Budget seeking an MSP Fund Grant in the amount of \$67,500 for 2022. AWEC proposes that this grant be funded from the AWEC MSP Fund Account. The following information is provided in accordance with Article 5.1 of the IFA:

(1) Statement of the Work to Be Performed by AWEC for which AWEC is Seeking an MSP Fund Grant:

AWEC has retained Davison Van Cleve, P.C. to represent AWEC in MSP Activities throughout the course of 2022. The IFA defines eligible MSP Activities as MSP-related activities apart from participation in any dockets or other formal proceedings before the Commission. MSP Activities include, but are not limited to, activities described in Sections 8.2 and 8.3 of the 2020 PacifiCorp Inter-Jurisdictional Allocation Protocol (“2020 Protocol”). MSP Activities do not include participation in Docket No. UM 1050 related to PacifiCorp’s inter-jurisdictional cost allocation. IFA, Article 1(g).

(2) Statement of the Breadth and Complexity of MSP Activities:

AWEC's MSP Activities include attendance at Framework Issues Workgroup meetings and teleconferences, as well as associated communications with MSP participants, review of materials distributed by PacifiCorp or other MSP stakeholders, and any follow-up activity.

AWEC expects to contribute to discussion during scheduled MSP Activities in 2022. Moreover, based on indications from the Company and stakeholders, AWEC expects that MSP Activities will continue through most of 2022.

(3) Significance of Any Policy Issues Directly Attributable to MSP Activities:

PacifiCorp's inter-jurisdictional cost allocation methodology is used to allocate the costs of its generation, transmission, distribution, and wholesale activities among its various service territories. All of PacifiCorp's states, except Washington, currently use the 2020 Protocol to allocate the Company's costs. MSP Activities may result in the identification of emerging issues which affect current cost allocation methodology.

(4) MSP Activities Schedule:

Framework Issues Workgroup meetings have been held on January 26-27 and March 10, 2022. Additional MSP Framework meetings are currently scheduled for May 4-5, and June 27-28, 2022. AWEC expects additional meetings to be scheduled for the second half of 2022.

(5) **Participation of Other Parties that Adequately Represent the Interests of Customers:**

AWEC represents the interests of large industrial customers that purchase power directly from PacifiCorp. AWEC's participation will directly benefit these customers, as well as other large non-residential customers who purchase service from PacifiCorp. No other organization represents the interests of Oregon industrial customers in the MSP Activities.

(6) **Statement of Activities to Be Performed by AWEC for which AWEC is Seeking an MSP Fund Grant:**

AWEC will participate in all aspects of 2022 MSP Activities to address inter-jurisdictional cost allocation issues, including attending any associated or follow-up clarifying sessions, workshops, settlement conferences, meetings, and oral presentations. AWEC may conduct discovery related to these MSP Activities. AWEC's attorneys and/or consultants will review, analyze and comment on issues related to cost allocation matters for PacifiCorp, including issues identified through discovery initiated by other parties.

(7) **Description of Areas to Be Investigated by AWEC Relating to MSP Activities:**

AWEC will investigate whether Oregon will be paying its fair share of PacifiCorp's generation, transmission, distribution and wholesale costs and revenues. Depending on the development of ongoing MSP Activities, AWEC might investigate a wide array of issues, including those related to cost allocation of load growth, hydro resources, conservation, renewable portfolio standards, thermal generation, and state policies.

(8) **A Budget of MSP Activities**

AWEC is seeking an MSP Fund Grant in the amount of \$67,500, which AWEC estimates is the uncommitted amount available in the 2022 AWEC MSP Fund. Attached as

Exhibit A is AWEC's proposed budget detailing the expected hours and hourly rates of AWEC's attorneys and experts.

(9) Matching Funds:

As required by Article 5.1 of the MSP IFA, AWEC represents that it 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 which AWEC is seeking an MSP Fund Grant.

Therefore, AWEC respectfully requests that the Commission issue an order granting an MSP Issue Fund Grant in the amount of \$67,500.

Dated this 15th day of March, 2022.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

Exhibit A

Proposed Budget of AWEC

UM 1586

Exhibit A

AWEC Proposed Budget for MSP Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Partner	95	\$310	\$29,450
Of Counsel	72	\$295	\$21,240
Paralegal	25	\$180	\$4,500
 <i>Expert Witness Fees</i>			
Expert	100	\$290	\$29,000
 <i>Other Expenses</i>			
Travel			\$110
Printing and Postage			\$75
Subtotal			\$84,375
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20% of AWEC Funded Expenditures			\$16,875
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Total AWEC MSP Fund Request			\$67,500