

# Davison Van Cleve PC

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October 4, 2018

***Via Electronic Mail and Federal Express***

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

Re: In the Matter of PACIFICORP  
Multi-State Process (“MSP”) Intervenor Funding Agreement  
**Docket No. UM 1586**

Dear Filing Center:

Enclosed please find the Request for Final Payment of MSP Fund Grant and Confidential Exhibit A on behalf of the Alliance of Western Energy Consumers. Pursuant to Section 6.1 of the MSP Intervenor Funding Agreement, Confidential Exhibit A is being submitted under seal to the Commission and PacifiCorp.

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

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosures  
cc: Etta Lockey  
(via U.S. Mail)

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1586**

In the Matter of	)	
	)	
PACIFICORP	)	REQUEST FOR FINAL PAYMENT OF
	)	MSP FUND GRANT OF THE
Multi-State Process Intervenor Funding	)	INDUSTRIAL CUSTOMERS OF
Agreement.	)	NORTHWEST UTILITIES
_____	)	

Pursuant to Section 6.1 of the Multi-State Process (“MSP”) Second Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) by Order No. 17-028, the Alliance of Western Energy Consumers (“AWEC”) hereby requests final payment of AWEC’s MSP Fund Grant in Docket No. UM 1586 in the amount of \$48,287.50.

On January 16, 2018, AWEC (then the Industrial Customers of Northwest Utilities) filed a Request for MSP Fund Grant and Proposed Budget in Docket No. UM 1586 in the amount of \$48,287.50. On January 17, 2018, the Commission approved an MSP Fund Grant for AWEC in the amount of \$48,287.50 by Order No. 18-012. At this time, AWEC requests final payment of its approved MSP Fund Grant in Docket No. UM 1586 in the amount of \$48,287.50. AWEC’s expenses are shown in Confidential Exhibit A.

This Request for Final Payment satisfies the requirements of the MSP IFA as follows:

**Section 6.1(a)** – The itemized expenses, payees, and hourly rates are attached as Confidential Exhibit A.

**Section 6.1(b)** – AWEC has been an active participant in this Docket. AWEC has participated in all meetings and conducted technical analysis of the appropriate interstate cost allocation methodology for PacifiCorp. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC’s participation in UM 1586.

**Section 6.1(c)** – The Commission approved AWEC’s proposed budget on January 17, 2018. In addition, AWEC used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.1 of the MSP IFA.

**Section 6.2** – All of the expenses included in Exhibit A are Eligible Expenses as defined in Section 6.2 of the MSP IFA because they relate to services provided or expenses incurred by AWEC’s outside legal counsel and expert witness. Relevant non-privileged documents substantiating the Eligible Expenses in Confidential Exhibit A are available for Commission audit, if requested, pursuant to Section 6.8 of the MSP IFA.

The MSP IFA provides that “the Commission will authorize reimbursement of Eligible Expenses upon satisfaction of any conditions imposed on the MSP Fund Grant and the requirements set forth in Article 6 and Article 7 [of the MSP IFA].” MSP IFA § 5.3. Likewise, the intervenor funding rules adopted by the Commission provide that “[t]he terms of an [intervenor funding] agreement are binding on all organizations seeking a grant under that agreement and will be followed by the Commission in administering the agreement.” OAR § 860-001-0120(2). AWEC has satisfied the terms of the MSP IFA and respectfully requests that the Commission approve final payment of AWEC’s MSP Fund Grant in the amount of \$48,287.50 within 30 days of receiving this Request for Final Payment, as provided in Section 6.4 of the MSP IFA.

Payment should be sent to:

Alliance of Western Energy Consumers  
c/o Tyler C. Pepple  
Davison Van Cleve, P.C.  
1750 SW Harbor Way, Suite 450  
Portland, OR 97201

Dated this 4th day of October, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

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