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October 10, 2018

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 PACIFICORP's Application for Approval of 2017R
Request for Proposals
Docket No. UM 1845

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the Request for Payment of Issue Fund Grant 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

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1845

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER,)	REQUEST FOR FINAL PAYMENT
)	OF ISSUE FUND GRANT OF THE
Application for Approval of 2017R Request for)	ALLIANCE OF WESTERN
Proposals.)	ENERGY CONSUMERS
_____)	

Pursuant to Section 7.3 of the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”) approved by the Oregon Public Utility Commission (“Commission”) in Order No. 18-017 (January 17, 2018), the Alliance of Western Energy Consumers (“AWEC”) hereby requests final payment of AWEC’s Issue Fund Grant in Docket No. UM 1845 in the amount of \$15,400.

On September 19, 2018, AWEC filed a Request for Issue Fund Grant and Proposed Budget in Docket No. UM 1845, showing eligible expenses in the amount of \$19,250 and requesting an Issue Fund Grant in the amount of \$15,400^{1/}. On October 3, 2018, the Commission issued Order No. 18-368, approving an Issue Fund Grant for AWEC in the amount of \$15,400. At this time, AWEC requests that the Commission authorize final payment of AWEC’s approved Issue Fund Grant in Docket No. UM 1845 in the amount of \$15,400 from the 2018 PacifiCorp Issue Fund. AWEC’s expenses are shown in Confidential Exhibit A.

^{1/} AWEC concurrently filed a Request for Payment and Reallocation of Issue Fund Grant in Docket No. UM 1824, in which AWEC requested that \$15,400 of its approved Issue Fund Grant in UM 1824 be reallocated for use in UM 1845. The Commission approved AWEC’s request on October 3, 2018, via Order No. 18-367.

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

Section 7.3(a) – The itemized expenses, payees, and hourly rates are attached as Confidential Exhibit A.

Section 7.3(b) – AWEC was an active participant in this Docket. AWEC reviewed the filings in this docket, including the confidential and highly confidential information, filed several rounds of comments, and attended public meetings. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC’s participation in UM 1845

Section 7.3(c) – The Commission approved AWEC’s proposed budget on May 9, 2018. In addition, AWEC used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA.

Section 7.3(d) - This Request for Payment constitutes a Final Request for Payment in this Docket.

Section 7.4 – All of the expenses included in Exhibit A are Eligible Expenses as defined in Section 7.4 of the IFA because they relate to services provided or expenses incurred by AWEC’s outside legal counsel and expert witnesses. Relevant non-privileged documents substantiating the Eligible Expenses in Confidential Exhibit A are available for Commission audit, if requested, pursuant to Section 7.10 of the IFA.

The IFA provides that the granting of an Issue Fund Grant “shall constitute a binding obligation on the Commission to order reimbursement of Eligible Expenses.” IFA § 6.5. 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 IFA and respectfully requests that the Commission approve final payment of AWEC’s Issue Fund Grant in the amount of \$15,400 from the 2018 PacifiCorp Issue Fund within 30 days of receiving this Request for Final Payment, as provided in Section 7.6 of the IFA.

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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 10th day of October, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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