

# Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com  
1750 SW Harbor Way, Suite 450  
Portland, OR 97201

September 19, 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:

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

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1845**

In the Matter of	)	MOTION OF THE ALLIANCE OF
	)	WESTERN ENERGY CONSUMERS TO
PACIFICORP, dba PACIFIC POWER,	)	DESIGNATE PROCEEDING AS ELIGIBLE
	)	FOR ISSUE FUNDS
2017R Request for Proposals.	)	
_____	)	

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 is concurrently filing its Request for Issue Fund Grant and Proposed Budget in this docket.

Section 1(c)(v) of the IFA defines an “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, [or] a significant impact on utility customers or the operations of the utility ....” PacifiCorp is one of the “Participating Utilities” in the IFA.<sup>1/</sup> Further, this proceeding is anticipated to have a substantial impact on utility rates and on PacifiCorp’s customers. This proceeding evaluated PacifiCorp’s 2017R Request for Proposals (“RFP”), including whether the Commission should acknowledge the final shortlist of bidders in that RFP. Ultimately,

---

<sup>1/</sup> IFA § 1(n).

PacifiCorp selected over 1,000 MW of new wind capacity, enabled by a new transmission line. The projected capital cost of the new wind projects alone is approximately \$1.5 billion.<sup>2/</sup> Moreover, the RFP process considered the selection of alternative bids which, depending on the assumptions, increased or decreased net benefits to customers from the acquisition by hundreds of millions of dollars.<sup>3/</sup> Accordingly, the outcome of this RFP has the potential to substantially impact utility rates, and whether the Commission acknowledges the final shortlist of bids from the RFP process ultimately influences whether the costs of these new wind projects will be included in customer rates.<sup>4/</sup>

For the foregoing reasons, therefore, AWEC moves that the Commission designate this proceeding as one that qualifies as an “Eligible Proceeding for Issue Funds” under the IFA.

Dated this 19th day of September, 2018

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*/s/ Tyler C. Pepple*  
Tyler C. Pepple  
1750 SW Harbor Way, Suite 450  
Portland, Oregon 97201  
(503) 241-7242  
tcp@dvclaw.com  
Of Attorneys for the Alliance of  
Western Energy Consumers

---

<sup>2/</sup> <http://www.pacificorp.com/about/newsroom/2018nrl/energy-vision-2020-wind-power-expansion.html>

<sup>3/</sup> See, e.g., IE Report at 31-32.

<sup>4/</sup> Order No. 18-178 at 9.