

# Davison Van Cleve PC

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June 12, 2018

***Via Electronic Filing and Federal Express***

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 CO.  
Draft Storage Potential Evaluation  
**Docket No. UM 1856**

Dear Filing Center:

Enclosed please find the Request for Final Payment of Issue Fund Grant and Confidential Exhibit A on behalf of the Alliance of Western Energy Consumers. Pursuant to Section 7.3 of the Intervenor Funding Agreement, Confidential Exhibit A is being submitted in a separate sealed envelope to the Commission and Portland General Electric Company.

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

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosures  
cc: Jay Tinker

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1856**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	REQUEST FOR FINAL PAYMENT
COMPANY,	)	OF ISSUE FUND GRANT OF THE
	)	ALLIANCE OF WESTERN
	)	ENERGY CONSUMERS
Draft Storage Potential Evaluation.	)	
_____	)	

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 1856 in the amount of \$20,000.

On February 14, 2018, AWEC (then the Industrial Customers of Northwest Utilities) filed a Notice of Intent to Request Issue Fund Grant and Proposed Budget in Docket No. UM 1856, showing eligible expenses in the amount of \$25,000 and requesting an Issue Fund Grant in the amount of \$20,000. On February 22, 2018, the Commission issued Order No. 18-060, approving an Issue Fund Grant for AWEC in the amount of \$20,000. At this time, AWEC requests that the Commission authorize final payment of AWEC’s approved Issue Fund Grant in Docket No. UM 1856 in the amount of \$20,000 from the 2018 PGE Issue Fund. AWEC’s expenses are shown in Confidential Exhibit A.

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 has been an active participant in this Docket. AWEC has conducted discovery, participated in settlement conferences, and filed testimony. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC’s participation in UM 1856.

**Section 7.3(c)** – The Commission approved AWEC’s proposed budget on February 22, 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 \$20,000 from the 2018 PGE Issue Fund within 30 days of receiving this Request for Final Payment, as provided in Section 7.6 of the 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 12th day of June, 2018

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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