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October 21, 2021

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, dba PACIFIC POWER,
Application for Authority to Implement a Decommissioning Cost Recovery
Adjustment and Coal Removal Mechanism.
Docket No. UM 2183

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Notice of Intent to Request Issue Fund Grant and Proposed Budget 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

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2183**

In the Matter of)	NOTICE OF INTENT TO REQUEST
)	ISSUE FUND GRANT AND PROPOSED
PACIFICORP, dba PACIFIC POWER,)	BUDGET OF THE ALLIANCE OF
)	WESTERN ENERGY CONSUMERS
Application for Authority to Implement a)	
Decommissioning Cost Recovery Adjustment and)	
Coal Removal Mechanism.)	
_____)	

The Alliance of Western Energy Consumers (“AWEC”) files this Notice of Intent to Request an Issue Fund Grant in Docket No. UM 2183, pursuant to OAR § 860-001-0120 and the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 18-020 (January 17, 2018).

1. On January 8, 2021, PacifiCorp (or the “Company”) filed its Application for Authority to Implement a Decommissioning Cost Recovery Adjustment and Coal Removal Mechanism. The Commission docketed the filing as UM 2183.

2. Pursuant to Commission Order No. 21-297 (Sept. 15, 2021), UM 2183 is an Eligible Proceeding for Issue Funds under Article 1(c)(v) of the IFA. Accordingly, an Issue Fund Grant may be made for this proceeding under the IFA.

3. Article 6.2 of the IFA requires an intervenor seeking an Issue Fund Grant to submit its Notice of Intent at the same time it files its Petition to Intervene. Because UM 2183 had not yet been designated an Eligible Proceeding for Issue Funds at the time of AWEC’s intervention, AWEC respectfully requests a waiver of this requirement.

4. As required by Article 6.2 of the IFA, this Notice of Intent is being served on each affected Participating Public Utility, all precertified organizations, and all parties identified on the service list for UM 2183.

5. AWEC identifies the PacifiCorp Issue Fund Account as the account from which AWEC intends to request the Issue Fund Grant.

6. AWEC has been precertified under Articles 5.1 and 5.2 of the IFA and OAR § 860-001-0120(3)(b) as eligible to receive an Issue Fund Grant, by Commission Order No. 03-502, which was entered on August 21, 2003.

7. Pursuant to Article 6.3 of the IFA, AWEC files this Proposed Budget in Docket No. UM 2183 (the “Proceeding”) and requests an Issue Fund Grant in the amount of \$30,000 from the 2021 and 2022 PacifiCorp Issue Funds. Specifically, AWEC proposes that its requested Issue Fund Grant be funded as follows: \$3,798.21 in reallocated funds from AWEC’s approved Issue Fund Grant in UE 390,^{1/} which was drawn from the 2021 PacifiCorp Issue Fund, and \$26,201.79 from the 2022 PacifiCorp Issue Fund.^{2/} If additional PacifiCorp Issue Funds become available, AWEC reserves the right to file an amended proposed budget and request an additional Issue Fund Grant. AWEC respectfully requests that the Commission act on this Proposed Budget within fourteen days of receipt, as provided in Article 6.4 of the IFA. The following information is provided in accordance with Article 6.3 of the IFA:

(1) Statement of the work to be performed by AWEC for which AWEC is seeking the Issue Fund Grant:

AWEC has retained Davison Van Cleve, P.C. to represent it in UM 2183. AWEC

^{1/} AWEC is concurrently filing a Request for Final Payment and Reallocation of Issue Fund Grant in UE 390 at the time it files this Notice of Intent and Proposed Budget in UM 2183.

^{2/} AWEC anticipates that UM 2183 will extend well into 2022 and therefore proposes that the majority of its requested Issue Fund Grant be funded from the 2022 PacifiCorp Issue Fund.

will attend all clarifying sessions, workshops, public meetings, oral presentations, and hearings in UM 2183, and plans to conduct discovery in this proceeding. In addition, AWEC will submit expert witness testimony and briefs as called for by the procedural schedule in this Docket.

(2) Description of the areas to be investigated by AWEC:

AWEC intends to investigate the reasonableness of PacifiCorp's forecasted decommissioning costs, as well as any other issues identified during discovery. In addition, AWEC will review any other issues raised by PacifiCorp's filing or by other parties.

(3) Description of the particular customer class or classes that will benefit from the intervenor's participation:

AWEC's participation will directly benefit industrial customers, as well as all other large non-residential customers of PacifiCorp.

(4) Identification of the specific Fund account from which AWEC is seeking the Issue Fund Grant and Available Funds:

AWEC proposes a total budget of \$37,500 and is seeking an Issue Fund Grant in the amount of \$30,000. AWEC estimates that the amount currently available in the PacifiCorp Issue Fund Account for 2021 is \$82,888.18^{3/} and estimates the amount available in the 2022 PacifiCorp Issue Fund will be \$143,750, plus any rollover balance from 2021.

(5) Budget showing estimated attorney and consultant fees and expert witness fees:

Attached as Exhibit A is AWEC's proposed budget in UM 2183.

^{3/} The Commission's current Intervenor Funding chart reflects a balance of \$92,588.18 in the 2021 PacifiCorp Issue Fund, though it appears the chart does not yet reflect AWEC's Request for Amendment of Proposed Budget in Docket No. UM 2024, approved by Commission via Order No. 21-303 (Sept. 17, 2021), in which AWEC requested that \$9,700 in 2021 PacifiCorp Issue Funds be used to fund AWEC's Request for Amendment of Proposed Budget in UM 2024.

(6) Matching Funds

As required by Article 6.3(g) of the IFA, AWEC represents that it will use matching fund resources 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 Issue Fund Grant. AWEC's proposed budget assumes a fully litigated case. If the case is settled prior to hearing, actual expenses could be lower.

Basis for Request

AWEC respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$30,000, based on the following considerations:

1. Any change in PacifiCorp's rates could substantially impact the rates PacifiCorp charges its customers, including AWEC's members, and warrants considerable scrutiny. In addition, the case raises important questions of policy and fact.
2. AWEC represents the interests of large energy consumers and has significant experience participating in Commission proceedings involving the Commission and PacifiCorp. In addition, AWEC has participated in numerous previous cases related to setting rates for PacifiCorp. Thus, AWEC possesses significant interest and expertise with respect to this proceeding. AWEC's participation will benefit all PacifiCorp industrial and large non-residential customers.
3. AWEC has been precertified under Articles 5.1 and 5.2 of the IFA and OAR § 860-001-0120(3)(b), as eligible to receive an Issue Fund Grant, by Commission Order No. 03-502, which was entered on August 21, 2003.

Therefore, AWEC respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount specified above.

Dated this 21st day of October, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

UM 2183

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	60	\$300	\$18,000
Attorney	20	\$275	\$5,500
Paralegal	10	\$170	\$1,700
<i>Expert Witness Fees</i>			
Expert	42	\$290	\$12,180
<i>Other Expenses</i>			
Travel			\$60
Printing and Postage			\$60
Subtotal			\$37,500
20% of AWEC-Funded Expenditures			\$7,500
Total AWEC-PacifiCorp Issue Fund Grant Proposed Budget			\$30,000
Total AWEC Issue Fund Request			\$30,000