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July 19, 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 Oregon Citizens' Utility Board and Alliance of Western Energy Consumers' Joint 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

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2183

In the Matter of)	
)	OREGON CITIZENS' UTILITY
PACIFICORP d/b/a PACIFIC POWER,)	BOARD'S AND ALLIANCE OF
)	WESTERN ENERGY CONSUMERS'
Application for Authority to Implement a)	JOINT MOTION TO DESIGNATE
Decommissioning Cost Recovery)	DOCKET AS ELIGIBLE PROCEEDING
<u>Adjustment and Coal Removal Mechanism.</u>)	FOR ISSUE FUNDS

Pursuant to Section 1(c)(v) of the Fourth Amended Intervenor Funding Agreement (“Fourth IFA”), approved on January 17, 2018 by the Public Utility Commission of Oregon (“Commission”) in Order No. 18-017, the Oregon Citizens’ Utility Board (“CUB”) and Alliance of Western Energy Consumers (“AWEC”) file this motion to designate the above-referenced docket as an “Eligible Proceeding for Issue Funds.”

Section 1(c)(v) of the Fourth IFA defines “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, a significant impact on utility customers or the operations of the utility, is likely to result in a significant change in regulatory policy, or raises novel questions of fact or law.”

This docket will directly affect PacifiCorp (or “Company”), which is a Participating Public Utility under Section 1(n) of the Fourth IFA and is participating in this docket.

Further, this proceeding is likely to have a substantial impact on PacifiCorp’s rates and its customers. If approved as filed, the Company’s application will result in a \$34.9 million rate increase, equivalent to 2.8%.^{1/} Additionally, the proceeding implicates important and complex legal and policy questions because, under the 2020 Interjurisdictional Allocation Protocol (“2020 Protocol”), the amount of decommissioning costs the Commission approves for recovery in this case will represent Oregon’s total decommissioning cost responsibility for the coal plants at issue, regardless of the actual decommissioning costs incurred for these plants.^{2/} Thus, approval of a cost estimate that is too high will result in customers over-paying for decommissioning costs, while approval of a cost estimate that is too low will result in PacifiCorp under-recovering its decommissioning costs from Oregon ratepayers. It is, therefore, imperative that the parties have the resources necessary to develop a robust record for the Commission to determine the most accurate estimate possible of decommissioning costs.

Therefore, for the foregoing reasons, CUB and AWEC respectfully move the Commission to designate this proceeding as an “Eligible Proceeding for Issue Funds” under the Fourth IFA.

Dated this 19th day of July, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

^{1/} PacifiCorp Application at 6.

^{2/} 2020 Protocol § 4.1.2.

/s/ Tyler C. Pepple

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OREGON CITIZENS' UTILITY BOARD

/s/Michael P. Goetz

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