

# Davison Van Cleve PC

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May 9, 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, dba PACIFIC POWER  
2019 Transition Adjustment Mechanism  
**Docket No. UE 339**

Dear Filing Center:

Please find enclosed the Request for Issue Fund Grant and Proposed Budget of the Alliance of Western Energy Consumers 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**

**UE 339**

In the Matter of	)	REQUEST FOR ISSUE FUND GRANT
	)	AND PROPOSED BUDGET OF THE
PACIFICORP, dba PACIFIC POWER,	)	ALLIANCE OF WESTERN ENERGY
	)	CONSUMERS
2019 Transition Adjustment Mechanism.	)	
_____	)	

Pursuant to Article 6.3 of the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) by Order No. 18-017 (January 17, 2018), the Alliance of Western Energy Consumers (“AWEC”) files this Request for Issue Fund Grant and Proposed Budget in Docket No. UE 339 (the “Proceeding”) in the amount of \$40,000. 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 AWEC in Docket No. UE 339. The IFA defines an Eligible Proceeding for Issue Funds as, among other things, “an annual power cost request (such as ... PacifiCorp’s TAM).” Accordingly, an Issue Fund Grant may be made for this proceeding under Article 6.1 the IFA.

AWEC plans to attend any settlement conferences, workshops, public meetings, oral presentations and hearings in UE 339. AWEC also plans to conduct and review discovery in

this proceeding. In addition, AWEC plans to 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 numerous aspects of PacifiCorp's 2019 Transition Adjustment Mechanism ("TAM"), including PacifiCorp's power costs, direct access charges, coal supply, and other issues. 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 at least \$50,000 and is seeking an Issue Fund Grant in the amount of \$40,000. AWEC will bear the costs of its participation to the extent that its costs exceed the proposed budget. However, if the Commission elects to modify the scope of this proceeding, AWEC reserves the right to file a request to amend its budget.

AWEC estimates that the amount currently available in the PacifiCorp Issue Fund Account for 2018 is \$72,785.53.

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

Attached as Exhibit A is AWEC's proposed budget in Docket No. UE 339.

## **(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. As such, AWEC seeks an Issue Fund Grant for 80% of its proposed budget in this proceeding. 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 \$40,000, based on the following considerations:

1. In this proceeding, PacifiCorp has proposed a \$16.9 million, or 1.3 percent, annual rate increase.
2. AWEC represents the interests of large energy consumers and has significant experience participating in Commission proceedings involving PacifiCorp's power costs. AWEC is the successor organization of the Industrial Customers of Northwest Utilities, which filed power cost testimony in all of PacifiCorp's past TAM cases, including Docket No. UE 323, PacifiCorp's most recent TAM proceeding. Thus, AWEC possesses significant interest and expertise with respect to the subject matter in this proceeding. AWEC's participation will benefit all of PacifiCorp's 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.<sup>1/</sup>

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

Dated this 9th day of May, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple  
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Of Attorneys for the Alliance of  
Western Energy Consumers

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<sup>1/</sup> Article I(j) (defining “ICNU” to include “any successor organization, provided that the organization continues to meet the requirements for certification in Article 5.2). AWEC is a successor organization to ICNU with the same purposes and member representation as ICNU.

UE 339

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	69	\$280	\$19,320
Attorney	40	\$225	\$9,000
Paralegal	9	\$170	\$1,530
 <i>Expert Witness Fees</i>			
Expert	100	\$200	\$20,000
Travel			\$100
Printing and Postage			\$50
Subtotal			\$50,000
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20% of AWEC Funded Expenditures			\$10,000
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<b>Total AWEC PacifiCorp Issue Fund Request</b>			<b>\$40,000</b>