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1750 SW Harbor Way, Suite 450
Portland, OR 97201

September 19, 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 PUBLIC UTILITY COMMISSION OF OREGON,
Investigation into PacifiCorp, dba Pacific Power's Oregon-Specific Cost
Allocation Issues.
Docket No. UM 1824

Dear Filing Center:

Please find enclosed the Request for Partial Payment and Reallocation of Issue Fund Grant, along with 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 PacifiCorp.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosures
cc: Etta Lockey

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1824

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	REQUEST FOR PARTIAL PAYMENT
OREGON,)	AND REALLOCATION OF ISSUE
)	FUND GRANT OF THE ALLIANCE OF
)	WESTERN ENERGY CONSUMERS
Investigation into PacifiCorp, dba Pacific)	
Power's Oregon-Specific Cost Allocation)	
Issues.)	

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 partial payment of AWEC’s Issue Fund Grant in Docket No. UM 1824 in the amount of \$3,999.60.

On January 18, 2018, AWEC (then the Industrial Customers of Northwest Utilities) filed a Request for Issue Fund Grant and Proposed Budget in Docket No. UM 1824, showing eligible expenses in the amount of \$37,500 and requesting an Issue Fund Grant in the amount of \$30,000. On January 30, 2018, the Commission issued Order No. 18-030, approving an Issue Fund Grant for AWEC in the amount of \$30,000. At this time, AWEC requests that the Commission authorize partial payment of the approved Issue Fund Grant in Docket No. UM 1824 in the amount of \$3,999.60 from the 2018 PacifiCorp Issue Fund. AWEC’s expenses are shown in Confidential Exhibit A.

PAGE 1 – REQUEST FOR PARTIAL PAYMENT AND REALLOCATION OF
ISSUE FUND GRANT OF AWEC

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Telephone (503) 241-7242

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, having participated in all scheduled workshops and public meetings regarding Oregon-specific cost allocation methodologies. In addition, AWEC filed comments on the report issued by Staff in this proceeding. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC’s participation in Docket No. UM 1824

Section 7.3(c) – The Commission approved AWEC’s proposed budget on January 30, 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 Partial 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 partial payment of AWEC’s Issue Fund Grant in the amount of

\$3,999.60 from the 2018 PacifiCorp Issue Fund within 30 days of receiving this Request for Partial Payment, as provided in Section 7.6 of the IFA.

Pursuant to Section 6.7 of the IFA, AWEC respectfully requests that the Commission reallocate \$15,400 of AWEC's approved Issue Fund Grant in this proceeding to Docket No. UM 1845. AWEC is concurrently filing its Request for Proposed Budget in Docket No. UM 1845.

Upon payment of this Request for Partial Payment and Reallocation of Issue Fund Grant, the balance of the UM 1824 Issue Fund Grant will be \$10,600.40, and the balance of AWEC's Proposed Budget in Docket No. UM 1845 will be \$15,400.^{1/}

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

^{1/} This amount assumes the Commission also grants AWEC's Request for Issue Fund Grant and Proposed Budget in Docket No. UM 1845.

Dated this 19th day of September, 2018

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

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