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September 19, 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's Application for Approval of 2017R
Request for Proposals
Docket No. UM 1845

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Request for 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

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1845

In the Matter of)	REQUEST FOR ISSUE FUND GRANT
)	AND PROPOSED BUDGET OF THE
PACIFICORP, dba PACIFIC POWER,)	ALLIANCE OF WESTERN ENERGY
)	CONSUMERS
2017R Request for Proposals.)	
_____)	

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. UM 1845 (the “Proceeding”) in the amount of \$15,400.

AWEC is filing this Request for Issue Fund Grant and Proposed budget concurrently with its Request for Partial Payment and Reallocation of Issue Fund Grant in Docket No. UM 1824. Although process has concluded in UM 1845, AWEC’s eligible expenses in this proceeding were greater than foreseen, while its eligible expenses in Docket No. UM 1824 were less than its approved Issue Fund Grant in that Docket.

Under the IFA, the deadline for submitting proposed budgets in an eligible proceeding “will be 30 days after the prehearing conference at the schedule for the proceeding is established or by such other date as the Commission designates.” IFA, Article 6.3. As no prehearing conference was held in this proceeding, and as of the Commission did not separately identify a deadline for proposed budgets, AWEC’s request is consistent with the IFA and prior

Commission orders granting Issue Fund requests under similar circumstances.^{1/} AWEC therefore 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 retained Davison Van Cleve, P.C. to represent AWEC in Docket No. UM 1845. The IFA defines an Eligible Proceeding for Issue Funds as, among other things, “any proceeding...that directly affects one or more of the Participating Utilities and is anticipated to have a substantial impact on utility rates or service [or] a significant impact on utility customers.” PacifiCorp is a Participating Utility under the terms of the IFA and, as described in the accompanying motion, PacifiCorp’s customers may be significantly impacted by the outcome of this proceeding. Accordingly, an Issue Fund Grant may be made for this proceeding under Article 6.1 the IFA.

AWEC has participated in all process in this docket, including attending public meetings, reviewing PacifiCorp’s request for acknowledgement of its 2017R Request for Proposals (“RFP”) and the Independent Evaluator’s report, and filing two rounds of comments. All of the work AWEC performed in this docket that forms the basis for its Issue Fund Grant request was performed in 2018.

^{1/} See In Re: Portland General Electric Co., Request for a General Rate Revision, Docket No. UE 319, Order No. 17-424 (Oct. 19, 2017).

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

AWEC has investigated the bids submitted in response to PacifiCorp's RFP, the bidding process, issues associated with PacifiCorp's transmission system, and the Independent Evaluator's final report to the Commission.

(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 \$19,250 and is seeking an Issue Fund Grant in the amount of \$15,400, which equals the amount of AWEC's request for reallocation from Docket No. UM 1824. Accordingly, AWEC is not requesting that its Issue Fund Grant be drawn from currently available funds in the 2018 PacifiCorp Issue Fund Account, which AWEC estimates to be \$12,785.53.

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

Attached as Exhibit A is AWEC's proposed budget in Docket No. UM 1845.

(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.

Basis for Request

AWEC respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$15,400, based on the following considerations:

1. In this proceeding, PacifiCorp sought approval its 2017R RFP solicitation process, whereby PacifiCorp sought up to 1,270 MW of new wind resources.

2. AWEC represents the interests of large energy consumers and has significant experience participating in Commission proceedings involving PacifiCorp and the Commission. 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.

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

Dated this 19th day of September, 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

UM 1845

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	41	\$280	\$11,480
Attorney	25	\$225	\$5,625
Paralegal	11	\$170	\$1,870
 <i>Expert Witness Fees</i>			
Expert	0	\$0	\$0
Travel			\$75
Printing and Postage			\$200
Subtotal			\$19,250
<hr/>			
20% of AWEC Funded Expenditures			\$3,850
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Total AWEC-PacifiCorp Issue Fund Grant Request			\$15,400