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ADMITTED IN OREGON AND WASHINGTON

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April 24, 2018

Oregon Public Utility Commission
Attn: Filing Center
550 Capitol Street, N.E., #215
P.O. Box 2148
Salem, Oregon 97308-2148

Re: In the Matter of AVISTA CORPORATION, dba AVISTA UTILITIES, Application to
Revise Book Depreciation Rates and Request Deferred Accounting (Docket UM 1933)
Proposed Issue Fund Budget of the Alliance of Western Energy Consumers

Dear Filing Center:

Pursuant to OAR § 860-012-0100(4), 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), Alliance of Western Energy Consumers (“AWEC”) hereby respectfully submits an issue fund budget of \$26,000. The proposed budget, after a 20% match by AWEC (\$5,200), could result in a potential issue fund grant of \$20,800. Based on available funds in Avista’s Issue Fund Account, however, and to leave funds for use by other parties, AWEC is requesting an Issue Fund Grant of only \$11,915. AWEC has coordinated this request with the request made by CUB, and Avista’s Issue Fund Account for 2018 has sufficient funds for this request.

AWEC’s proposed budget is based on AWEC’s full participation in this proceeding and expenses that have been incurred to date. AWEC’s request ensures access to Issue Funds by other parties and accounts for funds made available to AWEC in other matters. AWEC reserves its right to revise this request or to seek Matching Funds to the extent its actual participation in this docket exceeds the proposed budget or exceeds the resources available from Issue Funds.

Article 6.3 of the IFA provides that precertified intervenors seeking an issue fund grant must submit a proposed budget to the Commission. Accordingly, AWEC has attached a detailed budget as Appendix A.

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The IFA also requires the following information:

1. A Statement of the Work to be Performed.

AWEC has already participated in initial proceedings in this docket and will continue to participate in all stages of the review of Avista's application to revise book depreciation rates and its request for deferred accounting. This includes participation in settlement conferences, conducting discovery and drafting testimony. AWEC will sponsor witnesses for this proceeding who will assist in AWEC's analysis of Avista's request.

2. A Description of the Areas to be Investigated.

AWEC has and will focus on all aspects of Avista's application to revise book depreciation rates and its request for deferred accounting.

3. A Description of the Particular Customer Class(es) That Will Benefit from the Intervenor's Participation.

AWEC is a nonprofit association consisting of large electricity and natural gas consumers in the states of Oregon, Washington, and Idaho. Northwest Industrial Gas Users merged into the Industrial Customers of Northwest Utilities ("ICNU") on March 31, 2018, and ICNU changed its name to the Alliance of Western Energy Consumers on April 1, 2018. AWEC members include diverse industrial and commercial interests, including food processing, pulp and paper, wood products, electric generation, aluminum, steel, chemicals, electronics, aerospace, and healthcare providers. AWEC members take natural gas service from local distribution companies, including Avista, under industrial rate schedules. Accordingly, AWEC's advocacy will benefit the industrial rate classes.

4. Identification of the Specific Fund Accounts from Which the Intervenor is Seeking Monies.

AWEC identifies the Avista Issue Fund Account as the account from which AWEC is seeking monies. As of the date of this submittal, the uncommitted balance of that fund is \$34,240.50. AWEC's requested Issue Fund Budget will result in a maximum grant of \$11,915, less than the amount of the available funds. To the extent AWEC incurs costs that exceed this request, it will either seek to modify this request or seek Matching Funds.

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5. A Budget Showing Estimated Attorney, Consultant and Expert Witness Fees, Which May Include the Cost for Appropriate Support Staff and Operations Support.

AWEC has attached a detailed budget for AWEC's participation in this proceeding as Appendix A.

6. Representation that Intervenor will use matching funds in the form of either in-house resources or outside funding to account for or pay at least 20 percent of the Eligible Expenses.

AWEC represents that it will use matching funds in the form of either in-house resources or outside funding to account for or pay at least 20 percent of the Eligible Expenses.

CONCLUSION

AWEC respectfully requests that the Commission approve its Issue Fund Budget in the amount of \$26,000, and that the budget be approved as expeditiously as possible. AWEC further requests approval of an Issue Fund Grant in the amount of \$11,915 from 2018 funds in the Avista Issue Fund account.

Should you have any questions regarding this filing, please call.

Very truly yours,



Chad M. Stokes

APPENDIX A

**UM 1933
AWEC PROPOSED BUDGET FOR ISSUE FUND**

Legal Counsel

<u>Work to be Performed</u>	<u>Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Cost</u>
Review of Application, prehearing, discovery	Partner	10	\$275	\$2750
Settlement Conferences	Partner	10	\$275	\$2750
Testimony	Partner	10	\$275	\$2750
Hearing (if scheduled)	Partner	10	\$275	\$2750
Total AWEC Budget for Legal Services				\$11,000
Less 20% Match Using In-house Resources				\$2,200
Total AWEC Request for Legal Services				\$8,800

Estimated Expert Witness Budget for Issue Fund Grant

AWEC has retained Brad Mullins to assist with AWEC's analysis in this matter.

<u>Personnel</u>	<u>Title</u>	<u>Rate</u>
Bradley Mullins	Consultant	\$208/hour

Review filing, testimony, exhibits, workpapers, assistance with the preparation of data requests; preparation of testimony; attendance at settlement conferences and hearing (if scheduled).

Estimated Expert Witness Fees	\$15,000
20 Percent In-House Resources	\$3,000
Total AWEC Request for Expert Witness Fees	\$12,000

Total AWEC Issue Fund Budget Request (Legal + Expert)	\$26,000
Total AWEC 20% Match	\$5,200
Total AWEC Issue Fund Grant Possible (Budget – 20% in-house)	\$20,800
<u>Total Amount of Issue Fund Grant Request based on available funds</u>	<u>\$11,915</u>