

# Davison Van Cleve PC

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October 18, 2022

## *Via Electronic Filing*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem OR 97301

Re: PACIFICORP, dba PACIFIC POWER,  
Multi-State Process Fourth Amended and Restated Intervenor Funding  
Agreement.  
**Docket No. UM 1586**

Dear Filing Center:

Please find enclosed for filing the Request for Partial Payment of MSP Fund  
Grant of the Alliance of Western Energy Consumers.

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

Sincerely,

/s/ Anna V. Congdon  
Anna V. Congdon

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1586**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER,	)	REQUEST FOR PARTIAL PAYMENT
	)	OF MSP FUND GRANT OF THE
Multi-State Process Fourth Amended and	)	ALLIANCE OF WESTERN ENERGY
Restated Intervenor Funding Agreement.	)	CONSUMERS
_____	)	

Pursuant to Article 6.1 of the Multi-State Process (“MSP”) Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) by Order No. 20-189, the Alliance of Western Energy Consumers (“AWEC”) hereby requests partial payment of AWEC’s MSP Fund Grant in Docket No. UM 1586 in the amount of \$22,382.72.

On March 15, 2022, AWEC filed a Request for MSP Fund Grant and Proposed Budget in Docket No. UM 1586, requesting an MSP Fund Grant in the amount of \$67,500.00, and is awaiting a Commission order on its request. At this time, AWEC requests partial payment of its approved MSP Fund Grant in Docket No. UM 1586 in the amount of \$22,382.72, subject to Commission approval of AWEC’s Request and Proposed Budget.

AWEC’s expenses are shown in Confidential Exhibit A.

This Request for Partial Payment satisfies the requirements of the MSP IFA as follows:

**Section 6.1(a)** – The itemized expenses, payees, and hourly rates are attached as Confidential Exhibit A.

**Section 6.1(b)** – AWEC has been an active participant in this Framework Issues Workgroup. AWEC has participated in all meetings and conducted technical analysis of the appropriate interstate cost allocation methodology for PacifiCorp. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC’s participation in the Framework Issues Workgroup.

**Section 6.1(c)** – AWEC filed its Request for MSP Fund Grant and Proposed Budget on March 15, 2022, and is awaiting a Commission order on its request. In addition, AWEC used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.1 of the MSP IFA.

**Section 6.2** – All of the expenses included in Exhibit A are Eligible Expenses as defined in Section 6.2 of the MSP IFA because they relate to services provided or expenses incurred by AWEC’s outside legal counsel and expert witness. Relevant non-privileged documents substantiating the Eligible Expenses in Confidential Exhibit A are available for Commission audit, if requested, pursuant to Section 6.8 of the MSP IFA.

The MSP IFA provides that “the Commission will authorize reimbursement of Eligible Expenses upon satisfaction of any conditions imposed on the MSP Fund Grant and the requirements set forth in Article 6 and Article 7 [of the MSP IFA].” MSP IFA § 5.3. 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). If the Commission approves AWEC’s Request and Proposed Budget, AWEC has satisfied the terms of the MSP IFA and respectfully requests that the Commission approve partial payment of AWEC’s MSP Fund Grant in the amount of \$22,382.72 within 30 days of receiving this Request for Partial Payment, as provided in Article 6.4 of the MSP IFA.

Checks should be made payable to:

Alliance of Western Energy Consumers

Payment should be sent to:

Alliance of Western Energy Consumers  
c/o Tyler C. Pepple  
Davison Van Cleve, P.C.  
1750 S Harbor Way, Suite 450  
Portland, OR 97201

Dated this 18th day of October 2022.

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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