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November 17, 2020

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,
Multi-State Process Intervenor Funding Agreement
Docket No. UM 1586

Dear Filing Center:

Please find enclosed the Motion of the Alliance of Western Energy Consumers (“AWEC”) and the Oregon Citizens’ Utility Board (“CUB”) requesting authorization to roll over the remaining balances in AWEC and CUB’s respective 2020 MSP Fund Grants from 2020 to 2021.

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**

UM 1586

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER,)	MOTION OF THE ALLIANCE OF
)	WESTERN ENERGY CONSUMERS
Multi-State Process Intervenor Funding)	AND OREGON CITIZENS' UTILITY
Agreement.)	BOARD
_____)	

MOTION

Pursuant to OAR 860-001-0420 and Section 4.4 of the Multi-State Process Fourth Amended and Restated Intervenor Funding Agreement (“MSP IFA”), the Alliance of Western Energy Consumers (“AWEC”) and the Oregon Citizens’ Utility Board (“CUB”) jointly file this Motion requesting that the Oregon Public Utility Commission (“Commission”) authorize the rollover of the full remaining balance in AWEC’s and CUB’s respective 2020 MSP Fund Grants from 2020 to 2021. AWEC and CUB have consulted with PacifiCorp regarding this Motion and the utility has stated that it does not oppose the Motion.

Section 4.4 of the MSP IFA provides that any unused balance in the CUB MSP Fund and the AWEC MSP Fund may be rolled over to succeeding years during the term of the agreement (“the Rollover”). While the Rollover is generally capped at 50% of the Annual MSP Grant Amounts, “the Commission may authorize the Rollover to exceed 50% of the Annual MSP Grant Amounts in the CUB MSP Fund or AWEC MSP Fund to the extent CUB or AWEC, as

applicable, provide substantial evidence to justify the need for the Rollover to exceed 50 percent.”^{1/}

Substantial evidence exists to authorize a rollover of greater than 50% of both the CUB MSP Fund and AWEC MSP Fund from 2020 to 2021. The current interjurisdictional allocation of costs among PacifiCorp’s states is governed by the 2020 Protocol, which the Commission approved on January 23, 2020 in Order No. 20-024 in Docket No. UM 1050. The 2020 Protocol identifies several “Framework Issues” that remain to be resolved among the stakeholders in the MSP process. These Framework Issues are highly complex and are critical to developing an enduring interjurisdictional allocation agreement for PacifiCorp. They include: (1) resource planning and the assignment of new resources to each state; (2) the tracking and assignment of net power costs and benefits to each state with potentially different resource portfolios; (3) the treatment of special contracts; (4) the inclusion of Washington State into a full interjurisdictional allocation; and (5) the treatment of coal plant capital additions after December 31, 2023.^{2/} The 2020 Protocol requires that these issues be resolved by the end of 2023.^{3/} The 2020 Protocol establishes the Framework Issues Workgroup (which is similar in character to the MSP Workgroup, but consists only of signatories to the 2020 Protocol, including AWEC and CUB) to discuss and resolve these issues.

As a consequence of the COVID-19 pandemic and the press of other business (including several simultaneous rate cases throughout PacifiCorp’s service territory), meetings of the Framework Issues Workgroup in 2020 were substantially reduced and were held remotely.

^{1/} MSP IFA § 4.4.

^{2/} 2020 Protocol §§ 6.1-6.5.4.

^{3/} Id. § 2.2.

This significantly limited the progress made on the Framework Issues, meaning that relatively more work will be required in 2021 to ensure that sufficient progress is made on these complex and potentially contentious issues to reach resolution before the end of 2023. The few meetings held in 2020 also resulted in both AWEC and CUB using substantially less than their Annual MSP Grant Amounts. Further, if any travel restrictions are lifted in 2021, the rollover requested in this Motion will help ensure CUB and AWEC are able to meet any travel-related MSP costs.

Allowing a rollover of the full remaining balance in each of the CUB MSP Fund and the AWEC MSP Fund, therefore, will ensure that both organizations can fully and actively participate in what are expected to be far more substantial 2021 Framework Issues Workgroup meetings, to the benefit of PacifiCorp's customers and the State of Oregon.

For the foregoing reasons, AWEC and CUB respectfully move the Commission for an order authorizing the rollover of the full remaining balance in the 2020 AWEC MSP Fund and 2020 CUB MSP Fund to 2021.

Dated this 17th day of November, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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