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January 30, 2019

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,
2019 Renewable Adjustment Clause
Docket No. UE 352

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Notice of Intent to Request Issue Fund Grant and 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

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 352**

In the Matter of)	NOTICE OF INTENT TO REQUEST
)	ISSUE FUND GRANT AND REQUEST
PACIFICORP, dba PACIFIC POWER,)	FOR ISSUE FUND GRANT AND
)	PROPOSED BUDGET OF THE
2019 Renewable Adjustment Clause.)	ALLIANCE OF WESTERN ENERGY
_____)	CONSUMERS

The Alliance of Western Energy Consumers (“AWEC”) files this Notice of Intent to Request an Issue Fund Grant in Docket No. UE 352, pursuant to OAR § 860-001-0120 and the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 18-020 (January 17, 2018).

1. On December 28, 2018, PacifiCorp (or the “Company”) filed its request to implement the Company’s revised Schedule 202, or Renewable Adjustment Clause. The Commission docketed the filing as UE 352.

2. Pursuant to the Commission’s Order No. 19-024, issued on January 23, 2019, UE 352 is an Eligible Proceeding for Issue Funds under the IFA. Accordingly, an Issue Fund Grant may be made for this proceeding under Article 6.1 the IFA.

3. At the time that AWEC filed its petition to intervene in UE 352, the Commission had not yet designated this matter as an Eligible Proceeding for Issue Funds, as required by the Chief Administrative Law Judge’s February 12, 2018 Ruling in Docket No. UM 1909. Since AWEC’s intervention, the Commission has granted the Citizens’ Utility Board of

Oregon's motion requesting that the Commission designate this proceeding as eligible for an Issue Fund Grant. Accordingly, AWEC respectfully requests a waiver of the requirement in Article 6.2 of the IFA that its Notice of Intent be filed at the time of AWEC's intervention.

4. As required by Article 6.2 of the IFA, this Notice of Intent is being served on each affected Participating Public Utility, all precertified organizations, and all parties identified on the service list for UE 352.

5. AWEC identifies the PacifiCorp Issue Fund Account as the account from which AWEC intends to request the Issue Fund Grant.

6. 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.

7. Pursuant to Article 6.3 of the IFA, AWEC files this Proposed Budget in Docket No. UE 352 (the "Proceeding") for an Issue Fund Grant in the amount of \$40,000. If additional PacifiCorp Issue Funds become available, AWEC reserves the right to file an amended proposed budget and request an additional Issue Fund Grant. AWEC respectfully 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 has retained Davison Van Cleve, P.C. to represent it in UE 352. AWEC

will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in UE 352, and plans to conduct discovery in this proceeding. In addition, AWEC will submit expert witness testimony and briefs as called for by the procedural schedule in this Docket.

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

AWEC intends to investigate numerous aspects of PacifiCorp's Renewable Adjustment Clause, including the prudence of the projects for which cost-recovery is requested, the costs requested to be recovered, the benefits of the projects, and any other issues identified by other parties or through discovery.

(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 \$50,000 and is seeking an Issue Fund Grant in the amount of \$40,000. AWEC estimates that the amount currently available in the PacifiCorp Issue Fund Account for 2019 is \$163,567.36.

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

Attached as Exhibit A is AWEC's proposed budget in UE 352.

(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. AWEC's proposed budget assumes a fully litigated case. If the case is settled prior to hearing, actual expenses could be lower.

Basis for Request

AWEC respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$40,000, based on the following considerations:

1. Any change in PacifiCorp's rates could substantially impact the rates PacifiCorp charges its customers, including AWEC's members, and warrants considerable scrutiny. In addition, the case raises important questions of policy and fact.
2. AWEC represents the interests of large energy consumers and has significant experience participating in Commission proceedings involving the Commission and PacifiCorp. In addition, AWEC has participated in numerous previous cases related to setting rates for PacifiCorp. Thus, AWEC possesses significant interest and expertise with respect to this proceeding. AWEC's participation will benefit all PacifiCorp 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 30th day of January, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

PAGE 5 – NOTICE OF INTENT AND PROPOSED BUDGET FOR ISSUE FUND GRANT OF
AWEC

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UE 352

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	68	\$280	\$19,040
Attorney	40	\$225	\$9,000
Paralegal	10	\$170	\$1,700
<i>Expert Witness Fees</i>			
Expert	90	\$224	\$20,160
<i>Other Expenses</i>			
Travel			\$75
Printing and Postage			\$25
Subtotal			\$50,000
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20% of AWEC Funded Expenditures			\$10,000
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Total AWEC PACIFICORP Issue Fund Grant Proposed Budget			\$40,000
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Total AWEC Issue Fund Request			\$40,000