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November 15, 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 ALLIANCE OF WESTERN ENERGY CONSUMERS
Petition for a General Investigation into Long-Term Direct Access Programs.
Docket No. UM 2024

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Notice of Intent to Request 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 2024**

In the Matter of)	NOTICE OF INTENT TO REQUEST
)	ISSUE FUND GRANT AND PROPOSED
ALLIANCE OF WESTERN ENERGY)	BUDGET OF THE ALLIANCE OF
CONSUMERS,)	WESTERN ENERGY CONSUMERS
)	
Petition for a General Investigation into Long-)	
Term Direct Access Programs.)	
_____)	

The Alliance of Western Energy Consumers (“AWEC”) files this Notice of Intent to Request an Issue Fund Grant in Docket No. UM 2024, 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 April 9, 2019, AWEC filed its Petition for a General Investigation into Long-Term Direct Access Programs. The Commission docketed this proceeding as UM 2024.

2. On September 18, 2019, the Commission issued Order No. 19-306 designating this proceeding as an Eligible Proceeding for Issue Funds under Article 6.1(c) of the IFA.

3. Article 6.2 of the IFA requires that “any potential intervenor seeking an Issue Fund Grant must file a [Notice of Intent] when it submits its petition to intervene or notice of intervention in the matter or, for matters that do not involve a formal intervention, at such other time as the Commission designates.” Since AWEC is not required to submit a petition to

intervene in this proceeding, and as the Commission has not otherwise designated a due date for this Notice of Intent, this Notice of Intent is timely under Article 6.2 of the IFA.

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 UM 2024.

5. AWEC identifies the PGE and PacifiCorp Issue Fund Accounts as the accounts 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. UM 2024 (the “Proceeding”) for an Issue Fund Grant in the amount of \$20,000.00. Article 6.3 of the IFA provides that a “proposed budget may seek an Issue Fund Grant from funds that will be made available in the next calendar year” in instances where the intervenor expects to incur Eligible Expenses in more than one calendar year. Given the likely scope and early phase of this proceeding, AWEC expects to incur Eligible Expenses in 2020. Therefore, AWEC proposes that this Issue Fund Grant be drawn from the following sources: \$10,000 from the 2020 PGE Issue Fund Account; \$6,069.86 from the 2020 PacifiCorp Issue Fund Account; and \$3,930.14 in reallocated funds from AWEC’s approved Issue Fund Grant in Docket No. UM 1968. AWEC is concurrently filing a Request for Final Payment and Reallocation of Issue Fund Grant in UM 1968. If additional PGE and 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 UM 2024. AWEC will attend all clarifying sessions, workshops, public meetings, and oral presentations. In addition, AWEC will attend all hearings in UM 2024, conduct discovery, and submit expert witness testimony and briefs if called for by the procedural schedule in this Docket.

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

AWEC intends to investigate all aspects of PGE's and PacifiCorp's long-term direct access programs that the Commission determines to be within the scope of this proceeding.

(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 PGE.

(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 \$25,000.00 and is seeking an Issue Fund Grant in the amount of \$20,000.00. AWEC estimates that the amount currently available in the 2020 PGE Issue Fund Account is \$143,750, and estimates that the amount currently available in the 2020 PacifiCorp Issue Fund Account is \$143,750.

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

Attached as Exhibit A is AWEC's proposed budget in UM 2024.

(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 \$20,000.00, based on the following considerations:

1. The outcome of this investigation could result in a substantial change to regulatory policy and raises complex and novel questions of fact and law.
2. AWEC represents the interests of large energy consumers and has significant experience participating in Commission proceedings involving the Commission, PGE, and PacifiCorp. Thus, AWEC possesses significant interest and expertise with respect to this proceeding. AWEC's participation will benefit all of PGE and 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 15th day of November, 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

UM 2024

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	35	\$280	\$9,800
Attorney	22	\$225	\$4,950
Paralegal	11	\$170	\$1,870
<i>Expert Witness Fees</i>			
Expert	36	\$224	\$8,064
<i>Other Expenses</i>			
Travel			\$250
Printing and Postage			\$66
Subtotal			\$25,000
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20% of AWEC Funded Expenditures			\$5,000
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Total AWEC-PGE Issue Fund Grant Proposed Budget			\$10,000
Total AWEC-PacifiCorp Issue Fund Grant Proposed Budget			\$6,069.86
Amount of Request for Reallocation from UM 1968			\$3,930.14

**Total AWEC Issue Fund
Request**

\$20,000