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March 25, 2024

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 Investigation Into Long-Term Direct Access Programs.
Docket No. UM 2024

Dear Filing Center:

Please find the Request for Final Payment of Issue Fund Grant and on behalf of the Alliance of Western Energy Consumers.

Thank you for your assistance. Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/ Jesse O. Gorsuch

Jesse O. Gorsuch

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2024

In the Matter of)	
)	
ALLIANCE OF WESTERN ENERGY)	REQUEST FOR FINAL PAYMENT OF
CONSUMERS,)	ISSUE FUND GRANT OF THE
)	ALLIANCE OF WESTERN ENERGY
)	CONSUMERS
Petition for a General Investigation Into Long-)	
Term Direct Access Programs.)	
_____)	

Pursuant to Section 7.3 of 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), the Alliance of Western Energy Consumers (“AWEC”) hereby requests final payment of AWEC’s approved Issue Fund Grant in Docket No. UM 2024 in the amount of \$7,084.55.

On November 15, 2019, AWEC filed a Request for Issue Fund Grant and Proposed Budget in Docket No. UM 2024, showing eligible expenses in the amount of \$25,000 and requesting an Issue Fund Grant in the amount of \$20,000. The Commission issued Order No. 19-414 on November 25, 2019, approving an Issue Fund Grant for AWEC in the amount of \$20,000. On February 19, 2020, AWEC filed an amendment to its Proposed Budget, showing eligible expenses in the amount of \$50,000 and requesting a new Issue Fund Grant in the amount of \$40,000, which the Commission approved by Order No. 20-073. AWEC filed a second amendment to its Proposed Budget on September 17, 2020, showing eligible expenses of \$61,125.50 and requesting a new Issue Fund Grant of \$49,700.40, which the Commission

approved by Order No. 20-337. On September 16, 2021, AWEC filed a third amendment to its Proposed Budget, showing eligible expenses in the amount of \$74,250.50 and seeking a new Issue Fund Grant in the amount of \$59,400.40, which the Commission approved by Order No. 21-303. On October 21, 2020, AWEC filed a Request for Partial Payment in the amount of \$42,285.85, which the Commission approved by Order No. 20-418. On October 26, 2021, AWEC filed an additional Request for Partial Payment in the amount of \$10,030, which the Commission approved by Order No. 21-392.

At this time, AWEC requests that the Commission authorize final payment of AWEC's approved Issue Fund Grant in Docket No. UM 2024 in the amount of \$7,084.55 from the 2019 and 2021 PacifiCorp Issue Funds. AWEC's prior payment requests have exhausted the amounts awarded from PGE Issue Funds, as more fully described therein. Accordingly, upon payment of this Request for Final Payment, the balance of AWEC's approved Issue Fund Grant in UM 2024 will be zero.

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

Section 7.3(a) – The itemized expenses, payees, and hourly rates are attached as Confidential Exhibit A.

Section 7.3(b) – AWEC has been an active participant in this Docket. AWEC has researched direct access issues, filed two rounds of comments, a straw proposal to revise direct access programs, and participated in Commission workshops. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC's participation in UM 2024.

Section 7.3(c) – The Commission approved AWEC's proposed budgets on November 25, 2019, March 11, 2020, October 7, 2020, and September 16, 2021. In addition, AWEC used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA.

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Section 7.3(d) - This Request for Payment constitutes a Final Request for Payment in this Docket.

Section 7.4 – All of the expenses included in Exhibit A are Eligible Expenses as defined in Section 7.4 of the IFA because they relate to services provided or expenses incurred by AWEC’s outside legal counsel and expert witnesses. Relevant non-privileged documents substantiating the Eligible Expenses in Confidential Exhibit A are available for Commission audit, if requested, pursuant to Section 7.10 of the IFA.

The IFA provides that the granting of an Issue Fund Grant “shall constitute a binding obligation on the Commission to order reimbursement of Eligible Expenses.” IFA § 6.5. 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). AWEC has satisfied the terms of the IFA and respectfully requests that the Commission approve final payment of AWEC’s Issue Fund Grant in the amount of \$7,084.55 from the 2019 and 2021 PacifiCorp Issue Funds within 30 days of receiving this Request for Final Payment, as provided in Article 7.6 of the 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.
107 SE Washington St., Suite 430
Portland, OR 97214

Dated this 25th day of March, 2024.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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