

# Davison Van Cleve PC

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April 17, 2023

## *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 d/b/a PACIFIC POWER,  
2023 Integrated Resource Plan.  
**Docket No. LC 82**

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Proposed Budget and Request for Issue Fund Grant 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**

**LC 82**

In the Matter of	)	PROPOSED BUDGET AND REQUEST
	)	FOR ISSUE FUND GRANT OF THE
PACIFICORP d/b/a PACIFIC POWER,	)	ALLIANCE OF WESTERN ENERGY
	)	CONSUMERS
2023 Integrated Resource Plan.	)	
_____	)	

Pursuant to Article 6.3 of the Fifth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) in Order No. 22-506 (Dec. 29, 2022), the Alliance of Western Energy Consumers (“AWEC”) files this Proposed Budget in Docket No. LC 82 (the “Proceeding”) and Request for an Issue Fund Grant in the amount of \$40,000 from the 2023 PacifiCorp Issue Fund. 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 make its best efforts to 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 LC 82. AWEC will attend all clarifying sessions, workshops, public meetings, oral presentations, and hearings in LC 82, 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 2023 Integrated Resource Plan, including the utility's proposed resource procurement, its market price forecasts, its load forecast, its resource modeling, and any other issues identified during discovery. In addition, AWEC will review any other issues raised by PacifiCorp's filing or by other parties.

**(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 2023 is \$165,313.09

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

Attached as Exhibit A is AWEC's proposed budget in LC 82.

**(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 changes to PacifiCorp's rates as a result of this proceeding could substantially impact the rates PacifiCorp charges its customers, including AWEC's members, and warrant 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 17th day of April, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Corinne O. Olson

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*Of Attorneys for AWEC*

LC 82

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Partner	5	\$325	\$1,625
Senior Attorney	35	\$300	\$10,500
Junior Attorney	35	\$275	\$9,625
Paralegal / Law Clerk	18	\$200	\$3,600
<i>Expert Witness Fees</i>			
Expert	100	\$244	\$24,400
<i>Other Expenses</i>			
Travel			\$125
Printing and Postage			\$125
Subtotal			\$50,000
20% of AWEC-Funded Expenditures			\$10,000
<b>Total AWEC-PACIFICORP Issue Fund Grant Proposed Budget</b>			<b>\$40,000</b>
<b>Total AWEC Issue Fund Request</b>			<b>\$40,000</b>