

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com
107 SE Washington St., Suite 430
Portland, OR 97213

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 PACIFICORP, dba PACIFIC POWER,
Request for a General Rate Revision.
Docket No. UE 435

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Proposed Budget for Issue Fund Grant in the above-referenced docket.

Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

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

AWEC intends to investigate numerous aspects of PGE's Request for a General Rate Revision, including PGE's cost of capital, rate spread/rate design, general revenue requirement issues, pricing proposals for large customers, and any other issues identified during discovery. In addition, AWEC will review any other issues raised by PGE'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 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 \$74,500 and is seeking an Issue Fund Grant in the amount of \$59,600. AWEC estimates that the amount currently available in the PGE Issue Fund Account for 2024 is \$170,272.39.

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

Attached as Exhibit A is AWEC's proposed budget in UE 435.

(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 \$59,600, based on the following considerations:

1. Any change in PGE's rates could substantially impact the rates PGE 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 PGE. In addition, AWEC has participated in numerous previous cases related to setting rates for PGE. Thus, AWEC possesses significant interest and expertise with respect to this proceeding. AWEC's participation will benefit all PGE 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 25th day of March, 2024.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

107 SE Washington St., Suite 430

Portland, OR 97214

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Attorney for the Alliance of Western Energy Consumers

UE 435

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

| Personnel | Hours | Rate | Cost |
|--|-------|-------|-----------------|
| <i>Attorney Fees</i> | | | |
| Partner | 75 | \$325 | \$24,375 |
| Attorney | 75 | \$275 | \$20,625 |
| Paralegal | 25 | \$200 | \$5,000 |
| <i>Expert Witness Fees</i> | | | |
| Expert | 100 | \$244 | \$24,400 |
| <i>Other Expenses</i> | | | |
| Travel | | | \$50 |
| Printing and Postage | | | \$50 |
| Subtotal | | | \$74,500 |
| 20% of AWEC-Funded Expenditures | | | \$14,900 |
| Total AWEC-PGE Issue Fund Grant Proposed Budget | | | \$59,600 |
| Total AWEC Issue Fund Request | | | \$59,600 |