Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com Suite 450 1750 SW Harbor Way Portland, OR 97201

April 8, 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,

2020 Transmission Adjustment Mechanism

Docket No. UE 356

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 356

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
2020 Transmission Adjustment Mechanism.) 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 356, 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).

- On April 1, 2019, PacifiCorp (or the "Company") filed its annual
 Transmission Adjustment Mechanism. The Commission docketed the filing as UE 356.
- 2. UE 356 is an Eligible Proceeding for Issue Funds under Article 6.1(c) of the IFA. Accordingly, an Issue Fund Grant may be made for this proceeding under the IFA.
- 3. As required by Article 6.2 of the IFA, AWEC is filing this Notice of Intent at the time it files its Petition to Intervene this Docket.
- 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 356.
- AWEC identifies the PacifiCorp Issue Fund Account as the account from which AWEC intends to request the Issue Fund Grant.

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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 356 (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 356. AWEC

will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in

UE 356, 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) <u>Description of the areas to be investigated by AWEC:</u>

AWEC intends to investigate numerous aspects of PacifiCorp's 2019 Transition

Adjustment Mechanism, including PacifiCorp's power costs, direct access charges, coal supply,

and other issues. In addition, AWEC will review any other issues raised by PacifiCorp's filing

or by other parties.

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AWEC

DAVISON VAN CLEVE, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 (3) <u>Description of the particular customer class or classes that will benefit from the intervenor's participation:</u>

AWEC's participation will directly benefit industrial customers, as well as all

other large non-residential customers of PacifiCorp.

(4) <u>Identification of the specific Fund account from which AWEC is seeking the Issue Fund</u>

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 \$123,567.36.

(5) <u>Budget showing estimated attorney and consultant fees and expert witness fees:</u>

Attached as Exhibit A is AWEC's proposed budget in UE 356.

(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.

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AWEC

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 8th day of April, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

1750 SW Harbor Way, Suite 450

Portland, OR 97201

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Of Attorneys for the

Alliance of Western Energy Consumers

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DAVISON VAN CLEVE, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 Telephone (503) 241-7242

UE 356

<u>Exhibit A</u>

<u>AWEC Proposed Budget for Issue Fund Grant</u>

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

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