

# 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 433**

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

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 433**

In the Matter of	)	PROPOSED BUDGET FOR ISSUE
	)	FUND GRANT OF THE ALLIANCE OF
PACIFICORP, dba PACIFIC POWER,	)	WESTERN ENERGY CONSUMERS
	)	
Request for a General Rate Revision.	)	
_____	)	

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. UE 433 (the “Proceeding”) and Request for an Issue Fund Grant in the amount of \$98,175. AWEC proposes that this amount be funded as follows: \$66,130 from the 2024 PacifiCorp Issue Fund; \$24,358.04 in reallocated funds from AWEC approved Issue Fund Grant in Docket No. LC 82<sup>1</sup>; and \$7,686.96 in reallocated funds from AWEC’s approved Issue Fund Grant in Docket No. UM 2183.<sup>2</sup> 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 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:

---

<sup>1</sup> AWEC is concurrently filing its Request for Final Payment and Reallocation of Issue Fund Grant in Docket No. LC 82.  
<sup>2</sup> AWEC is concurrently filing its Request for Final Payment and Reallocation of Issue Fund Grant in Docket No. UM 2183.

**(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 433. AWEC will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in UE 433, 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 2024 General Rate Case, including the prudence of PacifiCorp's new system investments, its proposed catastrophic insurance fund, rate spread and rate design, its proposed capacity reservation charge and excess demand charge, and other issues. 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 \$122,718.75 and is seeking an Issue Fund Grant in the amount of \$98,175. AWEC estimates that the amount currently available in the PacifiCorp Issue Fund Account for 2024 is \$188,935.39.

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

Attached as Exhibit A is AWEC's proposed budget in UE 433.

**(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 \$98,175, 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.
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 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 433

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Partner	100	\$325	\$32,500
Attorney	120	\$275	\$33,000
Paralegal	25	\$200	\$5,000
<i>Expert Witness Fees</i>			
Expert	208	\$250	\$52,000
<i>Other Expenses</i>			
Travel			\$100
Printing and Postage			\$118.75
Subtotal			\$122,718.75
20% of AWEC Funded Expenditures			\$24,543.75
<b>Total AWEC- PacifiCorp Issue Fund Grant Request</b>			<b>\$98,175</b>