BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 389

In the Matter of

AVISTA CORPORATION, dba AVISTA UTILITIES.

Request for a General Rate Revision.

ALLIANCE OF WESTERN ENERGY CONSUMERS' NOTICE OF INTENT TO REQUEST ISSUE FUND GRANT

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. 18-017 (January 17, 2018), Alliance of Western Energy Consumers ("AWEC") hereby respectfully submits this Notice of Intent to Request an Issue Fund Grant in Docket UG 389. As required by the IFA, AWEC asserts the following:

- 1. UG 389 is an Eligible Proceeding under the IFA. The IFA defines an Eligible Proceeding as "any Commission proceeding that directly affects one or more of the Participating Public Utilities." IFA, Section 1(c). UG 389 will directly affect Avista Corporation, dba Avista Utilities ("Avista"), a Participating Public Utility under Section 1(n) of the IFA. Therefore, an Issue Fund Grant is permissible under Section 6.1 of the IFA.
- 2. As required by IFA Section 6.2, this Notice of Intent is being served on each affected Participating Public Utility, all pre-certified organizations, and all parties identified on the service list for UG 389.
- 3. AWEC identifies the Avista Issue Fund Account as the account from which AWEC intends to request the Issue Fund Grant. The amount of the request will depend on the availability of funds in that account when AWEC submits a budget.

- 4. AWEC is the successor to Northwest Industrial Gas Users ("NWIGU"), which is precertified under Section 5.2 of the IFA and OAR § 860-001-0120(3) as eligible to receive an Issue Fund Grant. AWEC continues to meet the precertification requirements of Section 5.2 of the IFA because: it is a non-profit organization, the primary purpose of which is to represent utility customers' interests on an ongoing basis; it represents a broad group of customers directed at public utility rates; it has already demonstrated an ability to effectively represent large energy users and substantively contribute to the record on behalf of those customers; and its members that are customers contribute a significant portion of AWEC's overall funding.
- 5. AWEC will submit a budget in accordance with Section 6.3 of the IFA. AWEC will also coordinate with the Citizens' Utility Board of Oregon before filing its budget.

Dated this 17th day of March 2020.

Respectfully submitted,

All St

Chad M. Stokes, OSB No. 004007

Tommy A. Brooks, OSB No. 076071

Cable Huston LLP

1455 SW Broadway, Suite 1500

Portland, OR 97201-3176 Telephone: (503) 224-3092 Facsimile: (503) 224-3176

E-Mail: cstokes@cablehuston.com

tbrooks@cablehuston.com

Attorneys for

Alliance of Western Energy Consumers