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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,
Application for Authority to Implement a Decommissioning Cost Recovery
Adjustment and Coal Removal Mechanism.
Docket No. UM 2183

Dear Filing Center:

Please find enclosed the Request for Final Payment and Reallocation of Issue Fund Grant on behalf of the Alliance of Western Energy Consumers 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**

UM 2183

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER,)	REQUEST FOR FINAL PAYMENT
)	AND REALLOCATION OF ISSUE
Application for Authority to Implement a)	FUND GRANT OF THE ALLIANCE OF
Decommissioning Cost Recovery Adjustment)	WESTERN ENERGY CONSUMERS
and Coal Removal Mechanism.)	
_____)	

Pursuant to Section 7.3 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”) hereby requests final payment of AWEC’s Issue Fund Grant in Docket No. UM 2183 in the amount of \$8,577.99.

On October 21, 2021, AWEC filed a Proposed Budget and Request for Issue Fund Grant in Docket No. UM 2183 in the amount of \$30,000, which the Commission approved by Order No. 21,398 on November 3, 2021. At this time, AWEC requests that the Commission authorize final payment of AWEC’s Issue Fund Grant in Docket No. UM 2183 in the amount of \$8,577.99 from the 2021 PacifiCorp Issue Fund. AWEC’s expenses are shown in Confidential Exhibit A.

This Request for Payment satisfies the requirements of the IFA as follows:

Section 7.3(a) – The itemized expenses, payees, and hourly rates are attached as Confidential Exhibit A.

Section 7.3(b) – AWEC has been an active participant in this Docket. AWEC reviewed the filings in this docket and participated in all processes to date to address the appropriate level of decommissioning costs for PacifiCorp’s coal plants.

Section 7.3(c) – The Commission approved AWEC’s initial proposed budget on November 3, 2021. In addition, AWEC used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.5 of the IFA.

Section 7.3(d) - This Request for Payment constitutes a Final Request for Payment in this Docket.

Section 7.4 – All of the expenses included in Exhibit A are Eligible Expenses as defined in Section 7.4 of the IFA because they relate to services provided or expenses incurred by AWEC’s outside legal counsel and expert witnesses. Relevant non-privileged documents substantiating the Eligible Expenses in Confidential Exhibit A are available for Commission audit, if requested, pursuant to Section 7.10 of the IFA.

The IFA provides that the granting of an Issue Fund Grant “shall constitute a binding obligation on the Commission to order reimbursement of Eligible Expenses.” IFA § 6.5. Likewise, the intervenor funding rules adopted by the Commission provide that “[t]he terms of an [intervenor funding] agreement are binding on all organizations seeking a grant under that agreement and will be followed by the Commission in administering the agreement.” OAR § 860-001-0120(2). AWEC has satisfied the terms of the IFA and respectfully requests that the Commission approve final payment of AWEC’s Issue Fund Grant in the amount of \$8,577.99 in the manner described above within 30 days of receiving this Request for Final Payment, as provided in Article 7.6 of the IFA.

Pursuant to Article 6.7 of the IFA, AWEC respectfully requests that the Commission reallocate the remaining \$21,422.01 in AWEC’s approved Issue Fund Grant in this proceeding to Docket Nos. UE 433 and UE 434. AWEC requests that \$7,686.96 be reallocated

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to Docket No. UE 433 and \$13,735.05 be reallocated to Docket No. UE 434. AWEC is concurrently filing a Request for Issue Fund Grant and Proposed Budget in both Dockets.

Upon payment of this Request for Final Payment and Reallocation of Issue Fund Grant, the balance of AWEC's UM 2183 Issue Fund Grant will be zero, and, if authorized by the Commission, the balance of AWEC's Proposed Budget in Docket No. UE 433 will be \$98,175, and the balance of AWEC's Proposed Budget in Docket No. UE 434 will be \$42,076.

Checks should be made payable to:

Alliance of Western Energy Consumers

Payment should be sent to:

Alliance of Western Energy Consumers
c/o Tyler C. Pepple
Davison Van Cleve, P.C.
107 SE Washington St., Suite 430
Portland, OR 97214

Dated this 25th day of March, 2024.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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