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October 9, 2018

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 Revised Depreciation Rates
Docket No. UM 1968

Dear Filing Center:

Please find enclosed the Motion of the Alliance of Western Energy Consumers to Designate Proceeding as Eligible for Issue Funds 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 1968

In the Matter of) MOTION OF THE ALLIANCE OF
PACIFICORP, dba PACIFIC POWER,) WESTERN ENERGY CONSUMERS TO
Application for Authority to Implement Revised) DESIGNATE PROCEEDING AS ELIGIBLE
Depreciation Rates.) FOR ISSUE FUNDS

Pursuant to Section 1(c)(v) of the Fourth Amended Intervenor Funding Agreement (“IFA”), approved on January 17, 2018 by the Oregon Public Utility Commission (“Commission”) in Order No. 18-017, and the Chief Administrative Law Judge’s February 12, 2018 Ruling in Docket No. UM 1909, the Alliance of Western Energy Consumers (“AWEC”) files this motion to designate the above-referenced docket as eligible for an Issue Fund Grant. The Oregon Citizens’ Utility Board has authorized AWEC to represent that it supports this motion.

Section 1(c)(v) of the IFA defines an “Eligible Proceeding For Issue Funds” as, among other things, a proceeding “so designated by the Commission that directly affects one or more of the Participating Utilities and is anticipated to have a substantial impact on utility rates or service, [or] a significant impact on utility customers or the operations of the utility” PacifiCorp is one of the “Participating Utilities” in the IFA.^{1/} Further, this proceeding is anticipated to have a substantial impact on utility rates and on PacifiCorp’s customers. In its application, PacifiCorp proposes to revise its depreciation rates in a manner that, if implemented,

^{1/} IFA § 1(n).

would ultimately increase its Oregon customers' rates by \$67.1 million. This equates to an approximate 4.5% rate increase. For comparison, this percentage increase is roughly equivalent to the rate increase PacifiCorp requested in its last general rate case application.^{2/} Further, PacifiCorp's depreciation study raises significant and complex policy issues related to the depreciable lives for the Company's thermal facilities, inclusion of certain capital investments in depreciation rates, and the appropriate timing for implementing the new depreciation rates.

For the foregoing reasons, therefore, AWEC moves that the Commission designate this proceeding as one that qualifies as an "Eligible Proceeding for Issue Funds" under the IFA.

Dated this 9th day of October, 2018

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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Of Attorneys for the Alliance of
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^{2/} Docket UE 263, Order No. 13-474 at 1 (Dec. 18, 2013).