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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 d/b/a PACIFIC POWER,
2023 Integrated Resource Plan.
Docket No. LC 82

Dear Filing Center:

Please find enclosed for filing the Request for Final Payment and Reallocation of Issue Fund Grant 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 contact me.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 82

In the Matter of)	
)	
PACIFICORP d/b/a PACIFIC POWER,)	REQUEST FOR FINAL PAYMENT
)	AND REALLOCATION OF ISSUE
2023 Integrated Resource Plan and Clean)	FUND GRANT OF THE ALLIANCE OF
Energy Plan.)	WESTERN ENERGY CONSUMERS
_____)	

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. LC 82 in the amount of \$5,719.74.

On April 17, 2023, AWEC filed a Proposed Budget and Request for Issue Fund Grant in Docket No. LC 82 in the amount of \$40,000. On April 21, 2023, the Commission approved an Issue Fund Grant for AWEC in the amount of \$40,000 by Order No. 23-150. On November 17, 2023, AWEC filed a Request for Partial Payment in the amount of \$9,922.22, which the Commission approved by Order No. 23-436.

At this time, AWEC requests that the Commission authorize final payment of AWEC’s Issue Fund Grant in Docket No. LC 82 in the amount of \$5,719.74 from the 2023 PacifiCorp Issue Fund. AWEC’s expenses are shown in Confidential Exhibit A.

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

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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, conducted discovery, filed comments in this Docket, and attended all Commission workshops and open meetings. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC’s participation in LC 82.

Section 7.3(c) – The Commission approved AWEC’s proposed budget on April 21, 2023. 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 partial payment of AWEC’s Issue Fund Grant in the amount of \$5,719.74 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 \$24,358.04 in AWEC's approved Issue Fund Grant in this proceeding to Docket No. UE 433. AWEC is concurrently filing a Proposed Budget and Request for Issue Fund Grant in Docket No. UE 433.

Upon payment of this Request for Final Payment and Reallocation of Issue Fund Grant, the balance of AWEC's LC 82 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.

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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