

# Davison Van Cleve PC

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November 19, 2019

## *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,  
2019 Integrated Resource Plan.  
**Docket No. LC 70**

Dear Filing Center:

Enclosed please find the Request for Partial Payment of Issue Fund Grant and Confidential Exhibit A on behalf of the Alliance of Western Energy Consumers. Pursuant to Section 7.3 of the Intervenor Funding Agreement, Confidential Exhibit A is being submitted under seal to the Commission and PacifiCorp.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosures  
cc: Etta Lockey

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 70**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER,	)	REQUEST FOR PARTIAL PAYMENT
	)	OF ISSUE FUND GRANT OF THE
2019 Integrated Resource Plan.	)	ALLIANCE OF WESTERN ENERGY
	)	CONSUMERS
_____	)	

Pursuant to Section 7.3 of 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), the Alliance of Western Energy Consumers (“AWEC”) hereby requests partial payment of AWEC’s Issue Fund Grant in Docket No. LC 70 in the amount of \$13,850.48.

On September 25, 2019, AWEC filed a Request for Issue Fund Grant and Proposed Budget in Docket No. LC 70, showing eligible expenses in the amount of \$6,100.10 and requesting an Issue Fund Grant in the amount of \$4,880.08. On September 27, 2019, the Commission issued Order No. 19-320, approving an Issue Fund Grant for AWEC in the amount of \$4,880.08. On November 1, 2019, AWEC filed a request to amend its proposed budget, seeking an increase of \$17,696.94 to its approved Issue Fund Grant in this proceeding, for a new grant in the amount of \$22,577.02. The Commission approved AWEC’s amended budget on November 7, 2019, by Order No. 19-382.

At this time, AWEC requests that the Commission authorize partial payment of AWEC's approved Issue Fund Grant in Docket No. LC 70 in the amount of \$13,850.48 from the 2019 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 attended pre-filing stakeholder meetings and workshops. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC's participation in LC 70.

**Section 7.3(c)** – The Commission approved AWEC's proposed budgets on September 27, 2019, and November 7, 2019. 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 Partial 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

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that the Commission approve partial payment of AWEC's Issue Fund Grant in the amount of \$13,850.48 from the 2019 PacifiCorp Issue Fund within 30 days of receiving this Request for Partial Payment, as provided in Article 7.6 of the IFA.

Upon payment of this Request for Partial Payment of Issue Fund Grant, the balance of AWEC's LC 70 Issue Fund Grant will be \$8,726.54.

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.  
1750 SW Harbor Way, Suite 450  
Portland, OR 97201

Dated this 19th day of November, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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