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September 25, 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:

Please find enclosed the Alliance of Western Energy Consumers' **Notice of Intent to Request Issue Fund Grant** and **Request for Issue Fund Grant and Proposed Budget** 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

As no prehearing conference has yet been held in this proceeding, and as the Commission has not separately identified a deadline for proposed budgets, AWEC's request is consistent with the IFA and prior Commission Orders granting Issue Fund requests under similar circumstances.^{1/}

4. As required by Article 6.2 of the IFA, this Notice of Intent is being served on each affected Participating Public Utility, all precertified organizations, and all parties identified on the service list for LC 70.

5. AWEC identifies the PacifiCorp Issue Fund Account as the account from which AWEC intends to request the Issue Fund Grant.

6. AWEC has been precertified under Articles 5.1 and 5.2 of the IFA and OAR § 860-001-0120(3)(b) as eligible to receive an Issue Fund Grant, by Commission Order No. 03-502, which was entered on August 21, 2003.

7. Pursuant to Article 6.3 of the IFA, AWEC files this Proposed Budget in Docket No. LC 70 (the "Proceeding") for an Issue Fund Grant in the amount of \$4,880.08.^{2/} If additional PacifiCorp Issue Funds become available, AWEC reserves the right to file an amended proposed budget and request an additional Issue Fund Grant. AWEC proposes that this grant be drawn from the \$4,880.08 in remaining funds in AWEC's approved Issue Fund Grant in Docket No. UE 352. AWEC is concurrently filing a request for reallocation of this amount from Docket No. UE 352 to this proceeding. AWEC respectfully requests that the Commission act on

^{1/} See In Re: Portland General Electric Co., Request for a General Rate Revision, Docket No. UE 319, Order No. 17-424 (Oct. 19, 2017); see also, In Re: PacifiCorp, dba Pacific Power, 2017R Request for Proposals, Docket No. UM 1845, Order No. 18-368 (Oct. 3, 2018)

^{2/} AWEC's Request for Issue Fund Grant and Proposed Budget assumes that the Commission grants AWEC's concurrently filed Request for Reallocation of Issue Fund Grant from Docket No. UE 352.

this Proposed Budget within fourteen days of receipt, as provided in Article 6.4 of the IFA. The following information is provided in accordance with Article 6.3 of the IFA:

(1) Statement of the work to be performed by AWEC for which AWEC is seeking the Issue Fund Grant:

AWEC has retained Davison Van Cleve, P.C. to represent it in LC 70. AWEC will attend all clarifying sessions, workshops, public meetings, oral presentations and hearings in LC 70, and plans to conduct discovery in this proceeding. In addition, AWEC will submit expert witness testimony and briefs as called for by the procedural schedule in this Docket.

(2) Description of the areas to be investigated by AWEC:

AWEC intends to investigate numerous aspects of PacifiCorp's 2019 IRP, including PacifiCorp's Action Plan, the economic lives of its coal-fired generation facilities, and any other issues identified by other parties or through discovery.

(3) Description of the particular customer class or classes that will benefit from the intervenor's participation:

AWEC's participation will directly benefit large energy consumers, as well as all other large non-residential customers of PacifiCorp.

(4) Identification of the specific Fund account from which AWEC is seeking the Issue Fund Grant and Available Funds:

AWEC proposes a total budget of \$6,100.10 and is seeking an Issue Fund Grant in the amount of \$4,880.08. As stated above, AWEC is proposing that this amount be reallocated from AWEC's approved Issue Fund Grant in UE 352 for use in this proceeding.

(5) Budget showing estimated attorney and consultant fees and expert witness fees:

Attached as Exhibit A is AWEC's proposed budget in LC 70.

(6) Matching Funds

As required by Article 6.3(g) of the IFA, AWEC represents that it will use matching fund resources in the form of either in-house resources or outside funding to account for or pay at least 20% of the Eligible Expenses for which AWEC is seeking an Issue Fund Grant.

Basis for Request

AWEC respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of \$4,880.08, based on the following considerations:

1. The Company's analysis of its future load and regulatory obligations, along with its proposed plan of action over the next two to four years, may have a direct bearing on the rates paid by AWEC's members. In addition, the case raises important questions of policy and fact.
2. AWEC represents the interests of large energy consumers and has significant experience participating in Commission proceedings involving the Commission and PacifiCorp. In addition, AWEC has participated in numerous previous cases related to setting rates for PacifiCorp. Thus, AWEC possesses significant interest and expertise with respect to this proceeding. AWEC's participation will benefit all PacifiCorp industrial and large non-residential customers.

3. AWEC has been precertified under Articles 5.1 and 5.2 of the IFA and OAR § 860-001-0120(3)(b), as eligible to receive an Issue Fund Grant, by Commission Order No. 03-502, which was entered on August 21, 2003.

Therefore, AWEC respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount specified above.

Dated this 25th day of September, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

LC 70

Exhibit A

AWEC Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	6	\$280	\$1,680
Attorney	5	\$225	\$1,125
Paralegal	5	\$170	\$850
<i>Expert Witness Fees</i>			
Expert	10	\$224	\$2,240
<i>Other Expenses</i>			
Travel			\$100
Printing and Postage			\$105.10
Subtotal			\$6,100.10
20% of AWEC Funded Expenditures			\$1,220.02
Total AWEC PACIFICORP Issue Fund Grant Proposed Budget			\$4,880.08
Total AWEC Issue Fund Request			\$4,880.08