

# Davison Van Cleve PC

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November 1, 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,  
2020 Transition Adjustment Mechanism  
**Docket No. UE 356**

Dear Filing Center:

Enclosed please find the Request for Final Payment and Reallocation 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**

**UE 356**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER,	)	REQUEST FOR FINAL PAYMENT
	)	AND REALLOCATION OF ISSUE
2020 Transition Adjustment Mechanism.	)	FUND GRANT OF THE 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 final payment of AWEC’s Issue Fund Grant in Docket No. UE 356 in the amount of \$22,303.06.

On April 8, 2019, AWEC filed a Request for Issue Fund Grant and Proposed Budget in Docket No. UE 356, showing eligible expenses in the amount of \$50,000 and requesting an Issue Fund Grant in the amount of \$40,000. On April 11, 2019, the Commission issued Order No. 19-124, approving an Issue Fund Grant for AWEC in the amount of \$40,000. At this time, AWEC requests that the Commission authorize final payment of AWEC’s approved Issue Fund Grant in Docket No. UE 356 in the amount of \$22,303.06 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.

PAGE 1 – AWEC REQUEST FOR FINAL PAYMENT AND REALLOCATION OF ISSUE FUND GRANT

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Telephone (503) 241-7242

**Section 7.3(b)** – AWEC was an active participant in this Docket. AWEC reviewed the filings in this docket, filed testimony, and attended settlement discussions. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC’s participation in UE 356.

**Section 7.3(c)** – The Commission approved AWEC’s proposed budget on April 11, 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 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 \$22,303.06 from the 2019 PacifiCorp Issue Fund 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 \$17,696.94 of AWEC’s approved Issue Fund Grant in this

proceeding to Docket No. LC 70. AWEC is concurrently filing its Request for Amendment of Proposed Budget in Docket No. LC 70.

Upon payment of this Request for Final Payment and Reallocation of Issue Fund Grant, the balance of AWEC's UE 356 Issue Fund Grant will be zero, and the balance of AWEC's Proposed Budget in Docket No. LC 70 will be \$22,577.02<sup>1/</sup>.

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 1st day of November, 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

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<sup>1/</sup> This amount assumes the Commission also grants AWEC's Request for Amendment of Proposed Budget in Docket No. LC 70.