

# Davison Van Cleve PC

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October 21, 2019

*Via Electronic Mail and Federal Express*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Salem OR 97301

Re: In the Matter of PACIFICORP  
Multi-State Process (“MSP”) Intervenor Funding Agreement  
**Docket No. UM 1586**

Dear Filing Center:

Enclosed please find the Request for Final Payment of MSP Fund Grant and Confidential Exhibit A on behalf of the Alliance of Western Energy Consumers (“AWEC”). Pursuant to Article 6.1 of the MSP Intervenor Funding Agreement, AWEC is submitting Confidential Exhibit A 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  
(via U.S. Mail)

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1586**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER,	)	REQUEST FOR FINAL PAYMENT OF
	)	MSP FUND GRANT OF THE
Multi-State Process Intervenor Funding	)	ALLIANCE OF WESTERN ENERGY
Agreement.	)	CONSUMERS
_____	)	

Pursuant to Article 6.1 of the Multi-State Process (“MSP”) Third Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Oregon Public Utility Commission (“Commission”) by Order No. 19-013, as well as the Amendment to the MSP IFA approved by the Commission through Order No. 19-340, the Alliance of Western Energy Consumers (“AWEC”) hereby requests final payment of AWEC’s MSP Fund Grant in Docket No. UM 1586 in the amount of \$52,500.

On January 2, 2019, AWEC filed a Request for MSP Fund Grant and Proposed Budget in Docket No. UM 1586 in the amount of \$45,000. On January 16, 2019, the Commission approved an MSP Fund Grant for AWEC in the amount of \$45,000 by Order No. 19-014. On September 26, 2019, parties to the MSP IFA filed an Amendment to the MSP IFA to increase the amounts available to the AWEC and CUB MSP Funds by \$7,500 for each fund. The Commission approved this Amendment on October 15, 2019, by Order No. 19-340. At this time, AWEC requests final payment of its approved MSP Fund Grant in Docket No. UM 1586 in the amount of \$52,500, which consists of AWEC’s initially approved budget of \$45,000, plus the

approved increase to the AWEC MSP Fund of \$7,500. Pursuant to Article 5.4 of the MSP IFA, AWEC is concurrently filing a Request for Amendment of Proposed Budget in this Proceeding, showing eligible expenses of \$65,625 and seeking a new MSP Fund Grant in the amount of \$52,500.

AWEC's expenses are shown in Confidential Exhibit A.

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

**Section 6.1(a)** – The itemized expenses, payees, and hourly rates are attached as Confidential Exhibit A.

**Section 6.1(b)** – AWEC has been an active participant in this Docket. AWEC has participated in all meetings and conducted technical analysis of the appropriate interstate cost allocation methodology for PacifiCorp. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC's participation in UM 1586.

**Section 6.1(c)** – The Commission approved AWEC's proposed budget on January 16, 2019; the Commission's ruling on AWEC's requested amendment to its proposed budget, filed on October 21, 2019, is pending. In addition, AWEC used its own funds to pay for at least 20% of the Eligible Expenses as required by Section 6.1 of the MSP IFA.

**Section 6.2** – All of the expenses included in Exhibit A are Eligible Expenses as defined in Section 6.2 of the MSP IFA because they relate to services provided or expenses incurred by AWEC's outside legal counsel and expert witness. Relevant non-privileged documents substantiating the Eligible Expenses in Confidential Exhibit A are available for Commission audit, if requested, pursuant to Section 6.8 of the MSP IFA.

The MSP IFA provides that “the Commission will authorize reimbursement of Eligible Expenses upon satisfaction of any conditions imposed on the MSP Fund Grant and the requirements set forth in Article 6 and Article 7 [of the MSP IFA].” MSP IFA § 5.3. 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 MSP IFA and respectfully requests that the Commission approve final payment of AWEC’s MSP Fund Grant in the amount of \$52,500 within 30 days of receiving this Request for Final Payment<sup>1/</sup>, as provided in Article 6.4 of the MSP IFA.

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 21st day of October, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple  
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<sup>1/</sup> AWEC’s request assumes the Commission also approves AWEC’s Request for Amendment of Proposed Budget, filed on October 21, 2019.