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January 2, 2019

Via Electronic Filing

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

Re: PACIFICORP, dba PACIFIC POWER,
Multi-State Process Third Amended and Restated Intervenor Funding Agreement.
Docket No. UM 1586

Dear Filing Center:

Enclosed for filing in the above-reference docket, please find the Request for MSP Fund Grant and Proposed Budget of the Alliance of Western Energy Consumers.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1586

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER)	REQUEST FOR MSP FUND GRANT
)	AND PROPOSED BUDGET
Multi-State Process Third Amended and)	OF THE ALLIANCE OF WESTERN
Restated Intervenor Funding Agreement.)	ENERGY CONSUMERS
_____)	

Pursuant to Section 5.1 of the Multi-State Process (“MSP”) Third Amended and Restated Intervenor Funding Agreement (“IFA”), the Alliance of Western Energy Consumers (“AWEC”) files this Proposed Budget seeking an MSP Fund Grant in the amount of \$45,000 for 2019^{1/}. AWEC proposes that this grant be funded from the AWEC MSP Fund Account. The following information is provided in accordance with Article 5.1 of the IFA:

(1) Statement of the Work to Be Performed by AWEC for which AWEC is Seeking an MSP Fund Grant:

AWEC has retained Davison Van Cleve, P.C. to represent AWEC in MSP Activities throughout the course of 2019. The IFA defines eligible MSP Activities as MSP-related activities apart from participation in any dockets or other formal proceedings before the Commission. MSP Activities include, but are not limited to, activities described in Section XIII of the 2017 PacifiCorp Inter-Jurisdictional Allocation Protocol (“2017 Protocol”). MSP Activities do not include participation in Docket No. UM 1050 related to PacifiCorp’s

^{1/} AWEC’s request assumes the Commission approves the Third Amended and Restated MSP IFA, filed by PacifiCorp on December 20, 2018. Pursuant to Section 5.1 of the IFA, AWEC is submitting its proposed budget on January 2, 2019 as January 1st was a Commission-recognized holiday.

inter-jurisdictional cost allocation. IFA, Article 1(g).

(2) **Statement of the Breadth and Complexity of MSP Activities:**

AWEC's MSP Activities include attendance at MSP Workgroup meetings, teleconferences, and the annual Commissioner Forum, as well as associated communications with MSP participants, review of materials distributed by PacifiCorp or other MSP stakeholders, and any follow-up activity.

AWEC expects to contribute to discussion during scheduled MSP Activities in 2019. Moreover, based on indications from the Company and stakeholders, AWEC expects that MSP Activities will continue through most of 2019.

(3) **Significance of Any Policy Issues Directly Attributable to MSP Activities:**

PacifiCorp's inter-jurisdictional cost allocation methodology is used to allocate the costs of its generation, transmission, distribution and wholesale activities among its various service territories. All of PacifiCorp's states, except Washington, currently use the 2017 Protocol to allocate the Company's costs. MSP Activities may result in the identification of emerging issues which affect current cost allocation methodology.

(4) **MSP Activities Schedule:**

An MSP Workgroup is scheduled for January 31, 2019 and the morning of February 1, 2019, to be followed by a Commissioner Forum the afternoon of February 1st. Additional MSP workgroup meetings are scheduled for March 6 and 7, 2019, April 16 and 17, 2019, and May 22 and 23, 2019. Additional MSP workgroup meetings may be scheduled in subsequent months depending on the progress of negotiations.

(5) **Participation of Other Parties that Adequately Represent the Interests of Customers:**

AWEC represents the interests of industrial customers that purchase electricity directly from PacifiCorp. AWEC's participation will directly benefit industrial customers, as well as other large non-residential customers who purchase service from PacifiCorp. No other organization represents the interests of Oregon industrial customers in the MSP Activities.

(6) **Statement of Activities to Be Performed by AWEC for which AWEC is Seeking an MSP Fund Grant:**

AWEC will participate in all aspects of 2019 MSP Activities to address inter-jurisdictional cost allocation issues, including attending any associated or follow-up clarifying sessions, workshops, settlement conferences, meetings, and oral presentations. AWEC may conduct discovery related to these MSP Activities. AWEC's attorneys and/or consultants will review, analyze and comment on issues related to cost allocation matters for PacifiCorp, including issues identified through discovery initiated by other parties.

(7) **Description of Areas to Be Investigated by AWEC Relating to MSP Activities:**

AWEC will investigate whether Oregon will be paying its fair share of PacifiCorp's generation, transmission, distribution and wholesale costs and revenues. Depending on the development of ongoing MSP Activities, AWEC might investigate a wide array of issues, including those related to cost allocation of load growth, hydro resources, conservation, renewable portfolio standards, thermal generation, and state policies.

(8) **A Budget of MSP Activities**

AWEC is seeking an MSP Fund Grant in the amount of \$45,000, which AWEC estimates is the uncommitted amount available in the 2019 AWEC MSP Fund. Attached as

Exhibit A is AWEC's proposed budget detailing the expected hours and hourly rates of AWEC's attorneys and experts.

(9) Matching Funds:

As required by Article 5.1 of the MSP IFA, AWEC represents that it will use matching funds 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 MSP Fund Grant.

Therefore, AWEC respectfully requests that the Commission issue an order granting an MSP Issue Fund Grant in the amount of \$45,000.

Dated this 2nd day of January, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

Exhibit A

Proposed Budget of AWEC

**PAGE 5 – REQUEST FOR MSP FUND GRANT AND PROPOSED BUDGET
OF AWEC**

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UM 1586

Exhibit A

AWEC Proposed Budget for MSP Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Attorney	108	\$280	\$30,240
Paralegal	20	\$170	\$3,400
<i>Expert Witness Fees</i>			
Expert	91	\$224	\$20,384
<i>Other Expenses</i>			
Travel			\$2,000
Printing and Postage			\$226
Subtotal			\$56,250
20% of AWEC Funded Expenditures			\$11,250
Total AWEC MSP Fund Request			\$45,000