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ADMITTED IN OREGON AND WASHINGTON

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Via Electronic Filing

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

Re: In the Matter of AVISTA CORPORATION, dba AVISTA UTILITIES, Request for a
General Rate Revision. (Docket UG 519)
Proposed Issue Fund Budget of the Alliance of Western Energy Consumers

Dear Filing Center:

Pursuant to OAR 860-001-0120 and the Fifth Amended and Restated Intervenor Funding Agreement (“IFA”), approved by the Public Utility Commission of Oregon (“Commission”) in Order No. 22-506 (December 29, 2022), Alliance of Western Energy Consumers (“AWEC”) hereby respectfully submits an Issue Fund Budget of \$56,250.00, which after 20 percent match by AWEC of \$11,250.00, would result in a maximum net requested Issue Fund Grant of \$45,000. To the extent AWEC’s actual costs exceed the maximum Issue Fund Grant amount, AWEC will either seek to amend the Issue Fund Grant request or seek Matching Funds.

Article 6.3 of the IFA provides that precertified intervenors seeking an Issue Fund Grant must submit a proposed budget to the Commission. Accordingly, AWEC has attached a detailed budget as Appendix A. AWEC’s proposed budget is based on AWEC’s full participation in this proceeding, including time and expenses that have already been incurred to date.

The IFA also requires the following information:

1. A Statement of the Work to be Performed.

AWEC has already started its review of Avista’s proposed rate increase and will continue to participate in all stages of the review of Avista’s request for a general rate revision. This includes: (a) a review of the initial filing, testimony and workpapers of Avista Corporation d/b/a Avista Utilities (“Avista”); (b) drafting discovery and reviewing discovery responses; (c) drafting testimony and reviewing the testimony of other parties; (d) drafting briefs and reviewing briefs of other parties; (e) participating in multiple settlement conferences and reviewing and revising any stipulation and supporting testimony; and (f) preparing for and participating in the evidentiary hearing and oral argument. AWEC has retained a consultant to assist legal counsel in this proceeding.

2. A Description of the Areas to be Investigated.

AWEC has and will focus on all aspects of Avista's request for a general rate revision. This includes a review and analysis of the requested revenue requirement, including return on equity, capital structure, cost of debt, capital additions, rate base, working capital, taxes, depreciation, wages and salaries, memberships and dues, directors' fees, operations and maintenance costs; Climate Protection Plan costs, and review of the long run incremental cost study and rate spread and rate design.

3. A Description of the Particular Customer Class(es) That Will Benefit from the Intervenor's Participation.

AWEC is a nonprofit association of end users of natural gas with major facilities in the states of Oregon, Washington, and Idaho. AWEC's gas members include diverse industrial and commercial interests, including food processing, pulp and paper, wood products, electric generation, aluminum, steel, chemicals, electronics, and aerospace. AWEC members take service from local distribution companies under industrial rate schedules. Accordingly, AWEC's advocacy will benefit the industrial rate class. AWEC's focus on the overall revenue requirement and cost of capital will benefit all customers, including residential customers.

4. Identification of the Specific Fund Accounts from Which the Intervenor is Seeking Monies.

AWEC identifies the Avista Issue Fund Account as the account from which AWEC is seeking monies. As of the date of this submittal, the uncommitted balance of that fund is approximately \$91,938.68. To the extent AWEC incurs costs that exceed this request, it will either seek to modify this request or seek Matching Funds. AWEC has coordinated its request with the Oregon Citizens' Utility Board.

5. A Budget Showing Estimated Attorney, Consultant and Expert Witness Fees, Which May Include the Cost for Appropriate Support Staff and Operations Support.

AWEC has attached a detailed budget for AWEC's participation in this proceeding as Confidential Appendix A.

6. Representation that Intervenor will use matching funds in the form of either in-house resources or outside funding to account for or pay at least 20 percent of the Eligible Expenses.

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 percent of the Eligible Expenses.

CONCLUSION

AWEC respectfully requests that the Commission approve its Issue Fund Budget in the amount of \$56,250.00. AWEC further requests approval of an Issue Fund Grant in the amount of \$45,000.00 from 2024 funds in the Avista Issue Fund account.

Should you have any questions regarding this filing, please call.

Very truly yours,



Chad M. Stokes