



3 Pursuant to Article 6.2, AWEC identifies the PacifiCorp Customer Representation Sub-Fund as the fund from which AWEC requests a Fund Grant. AWEC will file its Proposed Budget for this proceeding within 30 days of the conclusion of the prehearing conference or by such other date as the Commission designates.

4 The Participatory Funding Agreement provides funds “to qualified parties to enable them to advocate on behalf of broad customer interests in proceedings before the [Commission].”<sup>2</sup> To be eligible for funding under the Funding Agreement, a Participating Organization must be (1) case-certified for (2) an Eligible Proceeding. An “Eligible Proceeding” is, among other things, “any proceeding before the Commission carried out in accordance with or under the auspices of the public service laws, Commission regulations, or Commission orders ... directly affecting one or more of the Participating Public Utilities, in which matters materially affecting the public interest are at issue.”<sup>3</sup>

5 PacifiCorp’s proposal to reset baseline net power costs embedded in electric rates subject to Commission Order 09 in Docket No. UE-230172 qualifies as an “Eligible Proceeding.” PacifiCorp is a Participating Public Utility under the Funding Agreement.<sup>4</sup> Additionally, this case will be carried out under the public service laws, namely RCW § 80.28.020, among others, and it will materially affect the public interest. On April 1, 2025, PacifiCorp filed the proposed update to baseline net power costs with a rate effective date of January 1, 2026.<sup>5</sup> The overall rate impact of the tariff revisions is 7.9% relative to the present

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<sup>2</sup> Washington Participatory Funding Agreement, Recitals.

<sup>3</sup> Washington Participatory Funding Agreement, Article 1(c).

<sup>4</sup> *Id.* Article 1(g).

<sup>5</sup> Docket No. UE-250224, Transmittal Letter at 1 (Apr. 1, 2025).

revenue level requested in the Company’s rate year two compliance filing.<sup>6</sup> In addition, PacifiCorp proposes a new cost allocation protocol – the Washington 2026 Protocol – that changes how certain system resources are allocated to Washington, which would be in effect both for the power costs at issue in this proceeding and for all other rate changes going forward.

6 Under Article 5.1 of the Funding Agreement, “[o]nly parties that are case-certified for a particular proceeding will be eligible to receive Fund Grants.” Article 5.2.1 provides the necessary criteria for being case-certified to receive Fund Grants from the Customer Representation Sub-Fund. AWEC meets each of these criteria.

7 First, AWEC is neither a for-profit organization nor a governmental entity. AWEC is a non-profit organization formed for the benefit of its members.

8 Second, AWEC represents broad customer interests. AWEC represents the class of industrial customers that take electric service from PacifiCorp and has several members that are PacifiCorp industrial customers. While the Commission declined to specifically define what constitutes “broad customer interests” in its Policy Statement on Participatory Funding for Regulatory Proceedings,<sup>7</sup> RCW § 80.28.430(1), the statute authorizing the Funding Agreement, explicitly states that “broad customer interests” includes industrial customers. Moreover, the Commission has previously found that AWEC represents broad customer interests in PacifiCorp proceedings.<sup>8</sup>

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<sup>6</sup> *Id.* at 2. The Company’s Compliance Filing is filed in Docket Nos. UE-230172 and UE-210852 (consolidated).

<sup>7</sup> Docket No. U-210595, Policy Statement ¶ 27 (Nov. 19, 2021).

<sup>8</sup> Docket Nos. UE-230172/UE-210852, Order 04/02 at ¶¶ 12-14 (May 25, 2023); Docket No. UE-230482, Order 05 at ¶¶ 23-25 (May 3, 2024).

9 Third, AWEC has demonstrated in past proceedings that it is able to effectively represent PacifiCorp's industrial customers. AWEC has been granted intervention, and has fully participated, in many prior PacifiCorp rate proceedings, including its most recent General Rate Case, UE-230172 & UE-210852 (consolidated) and the 2022 Power Cost Adjustment Mechanism, UE-230482. AWEC routinely sponsors multiple expert witnesses that identify numerous adjustments to PacifiCorp's proposed revenue requirement, including power costs. AWEC also participated for many years in PacifiCorp's Multi-State Protocol process, which was dedicated to addressing the proper inter-jurisdictional allocation of system costs. AWEC's advocacy has directly resulted in lower energy costs both for industrial customers and for PacifiCorp's customers overall.

10 Fourth, no other party to this proceeding (and, thus, no other stakeholder that could be case-certified) adequately represents the interests of industrial customers. Moreover, as demonstrated above, the specific interests of industrial customers and the public interest will benefit from AWEC's participation in this proceeding.

11 Finally, AWEC's request for case-certification will not unduly delay this proceeding.

12 Accordingly, AWEC respectfully requests that its Petition for Case Certification be granted as provided in the Funding Agreement.

Dated this 10th day of April, 2025

Respectfully submitted,

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