

July 31, 2018

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

Attn: Filing Center

**RE: UM 1102(15)—Application for Reauthorization of Deferred Accounting Regarding  
Intervenor Funding Grants**

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket its Application for Reauthorization of Deferred Accounting Regarding Intervenor Funding Grants.

If you have any questions, please contact Natasha Siores at (503) 813-6583.

Sincerely,



Etta Lockey  
Vice President, Regulation

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1102(15)**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Reauthorization of Deferred  
Accounting Regarding Intervenor Funding  
Grants.

**APPLICATION FOR  
REAUTHORIZATION OF DEFERRED  
ACCOUNTING**

Under ORS 757.259 and OAR 860-027-0300, PacifiCorp, d/b/a Pacific Power, files this application (Application) with the Public Utility Commission of Oregon (Commission) for an order reauthorizing PacifiCorp to record and defer, on an ongoing basis, the cost of intervenor funding grants under ORS 757.259(3). PacifiCorp respectfully requests reauthorization for a 12-month period commencing August 1, 2018.

In support of this Application, and in accordance with OAR 860-027-0300(3) and (4), PacifiCorp states:

**A. PacifiCorp**

PacifiCorp is a public utility in the state of Oregon and is subject to the jurisdiction of the Commission with regard to rates, service, and accounting practices. PacifiCorp also provides retail electricity service in the states of California, Idaho, Utah, Washington, and Wyoming.

**B. Statutory Authority**

This Application is filed in accordance with ORS 757.259, which authorizes the deferral of expenses or revenues of a public utility for later incorporation in rates. ORS 757.259(3) allows for deferral of amounts provided in accordance with a financial assistance agreement entered into under ORS 757.072.

**C. Communications**

Communications regarding this Application should be addressed to:

PacifiCorp Oregon Dockets  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
Telephone: (503) 813-6583  
E-mail: [oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)

Matthew McVee  
Chief Regulatory Counsel  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
Telephone: (503) 813-5585  
E-mail: [matthew.mcvee@pacificorp.com](mailto:matthew.mcvee@pacificorp.com)

In addition, PacifiCorp requests that all data requests regarding this Application be sent to the following:

By email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, Oregon 97232

Informal questions may be directed to Natasha Siores, Manager, Regulatory Affairs, at (503) 813-6583.

**D. Basis for Application**

**1. Statutory Authority**

ORS 757.072 authorizes the Commission to approve an agreement between an energy utility and a customer organization for intervenor funding. ORS 757.259(3) allows a utility to recover intervenor funding in rates through deferred accounting:

Upon request of the public utility, the commission by order shall allow deferral of amounts provided as financial assistance under an agreement entered into under ORS 757.072 for later incorporation in rates.

Deferred amounts under ORS 757.259(3) are not subject to the percentage of gross revenues limitation on amortization or other provisions of subsections (5), (6), (7), and (8) of ORS 757.259.

**2. Commission Approval of the Intervenor Funding Agreement and the Multi-State Process Intervenor Funding Agreement**

On July 2, 2003, per section 2 of the Intervenor Funding Act, the Commission issued Order No. 03-388 in docket AR 462, which, among other things, approved the Intervenor Funding Agreement among PacifiCorp, Portland General Electric Company, Northwest Natural Gas Company, Northwest Industrial Gas Users, Oregon Citizens' Utility Board of (CUB), and Industrial Customers of Northwest Utilities (ICNU), dated February 5, 2003. On December 19, 2007, the Commission issued Order No. 07-564 in docket UM 1357 approving the Amended and Restated Intervenor Funding Agreement that extended intervenor funding until December 31, 2012. On November 20, 2012, the Commission issued Order No. 12-452 in docket UM 1357 approving the Second Amended and Restated Intervenor Funding Agreement that extended intervenor funding until December 31, 2017. The Intervenor Funding Agreement sets forth the amount of funding to be contributed by each utility and the procedures for budget submittals by intervenors, Commission approval of budgets, and the payment of grants by utilities. Additionally, the Intervenor Funding Agreement allows intervenors to request grants at any time during the calendar year. On October 20, 2016, the Commission issued Order No. 15-335 in docket UM 1357 approving the Third Amended and Restated Intervenor Funding Agreement that increased funding levels for certain Commission proceedings related to Northwest Natural Gas Company and Avista Corporation. On January 17, 2018, the Commission issued Order No. 18-017 in docket UM 1929 approving the Fourth Amended and Restated Intervenor Agreement that continues the three funds from which intervenor funding grants can be made and modified the amounts in each fund as reflected in the table below.

	PGE	Pacific Power	NW Natural	Cascade	Avista
CUB Fund	\$101,125	\$101,125	\$101,125	\$39,500	\$39,500
Preauthorized Matching Fund	\$72,738	\$72,738	\$72,738	\$37,950	\$37,950
Issue Fund	\$143,750	\$143,750	\$143,750	\$34,500	\$70,000

The agreement also makes changes regarding the Preauthorized Matching Funds and Issue Funds. The agreement allows ICNU and the Northwest Industrial Gas Users to request payment of Preauthorized Matching Grants semi-annually, rather than annually, and lowers the matching amount of internal resources or outside funding from 50 percent to 35 percent. With regard to Issue Funds, the agreement amends the definition of “eligible proceedings.” To help ease administrative efficiency, the agreement restricts eligible proceedings to significant proceedings, including general rate cases, mergers and acquisitions, integrated resource plans, annual power cost updates, and others so designated by the Commission.

In 2012, the Commission issued Order Nos. 12-110 and 12-122 in docket UM 1586 approving the Multi-State Process Intervenor Funding Agreement (MSP Funding Agreement) between PacifiCorp, CUB and ICNU. This agreement provides funding for CUB’s and ICNU’s participation in ongoing efforts to address how system costs are apportioned among PacifiCorp’s six-state territory. On February 7, 2017, the Commission issued Order No. 17-028 in docket UM 1586 approving the amended and restated MSP Funding Agreement that extended the intervenor funding until December 31, 2018. The MSP Funding Agreement provides the amount of funding to be provided and procedures for budgets, approvals and payment of intervenor funding grants.

**E. Request for Reauthorization of Deferred Accounting**

Under the instant docket, the Commission issued a series of orders authorizing PacifiCorp’s deferral of Intervenor Funding Agreement costs. The Commission originally authorized deferral of the Intervenor Funding Agreement costs beginning September 17, 2003, in Order No. 03-560. The Commission has reauthorized this deferral annually,<sup>1</sup> most recently in Order No. 17-314, which reauthorized the deferral through July 31, 2018. PacifiCorp seeks reauthorization of this deferral for a 12-month period beginning August 1, 2018.

**F. Amounts Subject to Deferral**

PacifiCorp anticipates that the maximum amounts to be deferred during the 12-month period beginning August 1, 2018 will be as shown below.

Intervenor Funding Agreement

CUB Fund	\$101,125
Preauthorized Matching Fund	\$ 72,738
Issue Fund	<u>\$143,750</u>
Total	<u>\$317,613</u>

MSP Funding Agreement

CUB	\$ 45,000
ICNU <sup>2</sup>	<u>\$ 45,000</u>
Total	<u>\$ 90,000</u>

Senate Bill 978 Funding Agreement<sup>3</sup>

Issue Fund	<u>\$20,000</u>
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<sup>1</sup> See Order No. 05-862 (entered July 18, 2005), Order No. 06-251 (entered May 25, 2006), Order No. 07-268 (entered June 11, 2007), Order No. 08-324 (entered June 13, 2008), Order No. 09-304 (entered August 3, 2009), in Order No. 10-323 (entered August 17, 2010), Order No. 11-388 (entered September 30, 2011), Order No. 12-364 (entered September 25, 2012), Order No. 13-294 (entered August 20, 2013), Order No. 14-299 (entered September 2, 2014), Order No. 15-268 (entered September 8, 2015), and Order No. 17-022 (entered January 24, 2017).

<sup>2</sup> In 2018, ICNU merged with the Northwest Industrial Gas Users to form the organization Alliance of Western Energy Consumers (AWEC).

<sup>3</sup> PacifiCorp and Portland General Electric Company are working with the Oregon Administrative Hearings Division on an intervenor funding agreement to provide issue grants to underrepresented residential customers to enable them to participate in proceedings before the Commission relating to Senate Bill 978. This amount is pending Commission approval of the Funding Agreement for Senate Bill 978 Issue Fund Grants, anticipated to be filed in third quarter 2018.

**G. Accounting**

PacifiCorp proposes to record payment of Intervenor Funding Grants in Account 182.3 – Other Regulatory Assets. In the absence of approval of deferred accounting, PacifiCorp would expense the amounts through FERC account 928 – Regulatory Commission Expenses.

**H. Description and Explanation of Entries in the Deferred Account to Date**

Attachment B provides the most recent entries in the deferred account to date of the Application. These entries are for amounts paid to intervenors as ordered by the Commission per the Intervenor Funding Agreement adopted by Order No. 12-452 and the MSP Funding Agreement adopted by Order No. 17-028.

**I. Reasons for Continuation of Deferred Accounting**

PacifiCorp requests the continuation of deferred accounting in order to seek future recovery of amounts previously approved in this docket.

**J. Use of Sub-accounts**

Ordering paragraph 2 of Order No. 10-323, docket UM 1102, requires PacifiCorp to separately account for each type of grant. Section 4.2 of the MSP Funding Agreement also requires PacifiCorp to separately account for each type of MSP Funding grant. PacifiCorp tracks intervenor funding grants by grant type through different internal order numbers. Issue fund grant amounts paid to ICNU are tracked through internal order number 313374. Issue fund grant amounts paid to CUB are tracked through internal order number 313431. Matching fund grant amounts paid to ICNU are tracked through internal order number 313430. Matching fund grant amounts paid to CUB are tracked through internal order number 313429. MSP fund grant amounts paid to CUB and ICNU are tracked through

internal order numbers 339031 and 339032, respectively.

**H. Notice**

A copy of the Notice of the Application of PacifiCorp for Reauthorization of Deferred Accounting Regarding Intervenor Funding Grants is included with this Application as Attachment A. This notice will be served to the service list from the company's most recent general rate case.

WHEREFORE, PacifiCorp respectfully requests that in accordance with ORS 757.259(3), the Commission reauthorize PacifiCorp to record and defer, on an ongoing basis and commencing as of August 1, 2018, Intervenor Funding Grants incurred by the company per the Intervenor Funding Agreement and the MSP Funding Agreement, as described in this Application.

DATED: July 31, 2018.

Respectfully submitted,



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Matthew McVee  
Chief Regulatory Counsel



**ATTACHMENT A**

**NOTICE**

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1102(15)**

In the Matter

PACIFICORP d/b/a PACIFIC POWER

Application for Reauthorization of Deferred  
Accounting Regarding Intervenor Funding  
Grants.

**Notice of Application for Reauthorization to  
Defer Intervenor Funding Costs**

On July 31, 2018, PacifiCorp d/b/a Pacific Power filed an Application with the Public Utility Commission of Oregon (Commission) for an order reauthorizing deferral of intervenor funding costs. Approval of PacifiCorp's Application will not authorize a change in rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding. Persons who wish to obtain a copy of PacifiCorp's filing should contact the following:

PacifiCorp Oregon Dockets  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
Telephone: (503) 813-6583  
E-mail: [oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)

Any person who wishes to submit written comments to the Commission must do so within 25 days of the date of PacifiCorp's application.

DATED: July 31, 2018.



Matthew McVee  
Chief Regulatory Counsel

## CERTIFICATE OF SERVICE

I certify that I electronically served a true and correct copy of PacifiCorp's **Notice of Application for Reauthorization to Defer Intervenor Funding Costs** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

### Service List UE 263

OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 <a href="mailto:dockets@oregoncub.org">dockets@oregoncub.org</a>	GREGORY M. ADAMS RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE, ID 83702 <a href="mailto:greg@richardsonadams.com">greg@richardsonadams.com</a>
GREG BASS NOBLE AMERICAS ENERGY SOLUTIONS, LLC 401 WEST A ST., STE. 500 SAN DIEGO, CA 92101 <a href="mailto:gbass@noblesolutions.com">gbass@noblesolutions.com</a>	KURT J BOEHM BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI, OH 45202 <a href="mailto:kboehm@bkllawfirm.com">kboehm@bkllawfirm.com</a>
STEVE W CHRISS (C) WAL-MART STORES, INC. 2001 SE 10TH ST BENTONVILLE, AR 72716-0550 <a href="mailto:stephen.chriss@wal-mart.com">stephen.chriss@wal-mart.com</a>	MARIANNE GARDNER (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308-1088 <a href="mailto:marianne.gardner@state.or.us">marianne.gardner@state.or.us</a>
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SARAH E LINK (C) PACIFIC POWER 825 NE MULTNOMAH ST STE 1800 PORTLAND, OR 97232 <a href="mailto:sarah.link@pacificorp.com">sarah.link@pacificorp.com</a>	JODY KYLER COHN BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 <a href="mailto:jkylar@bkllawfirm.com">jkylar@bkllawfirm.com</a>
KATHERINE A MCDOWELL (C) MCDOWELL RACKNER & GIBSON PC 419 SW 11TH AVE., SUITE 400 PORTLAND, OR 97205 <a href="mailto:katherine@mrg-law.com">katherine@mrg-law.com</a>	SAMUEL L ROBERTS (C) HUTCHINSON COX COONS ORR & SHERLOCK 777 HIGH ST STE 200 PO BOX 10886 EUGENE, OR 97440 <a href="mailto:sroberts@eugenelaw.com">sroberts@eugenelaw.com</a>

<p>TRACY RUTTEN  LEAGUE OF OREGON CITIES  1201 COURT STREET NE  SUITE 200  SALEM, OR 97301  <a href="mailto:trutten@orcities.org">trutten@orcities.org</a></p>	<p>IRION A SANGER (C)  SANGER LAW PC  1117 SE 53RD AVE  PORTLAND, OR 97215  <a href="mailto:irion@sanger-law.com">irion@sanger-law.com</a></p>
<p>DONALD W SCHOENBECK (C)  REGULATORY &amp; COGENERATION  SERVICES INC  900 WASHINGTON ST STE 780  VANCOUVER, WA 98660-3455  <a href="mailto:dws@r-c-s-inc.com">dws@r-c-s-inc.com</a></p>	<p>NONA SOLTERO  FRED MEYER STORES/KROGER  3800 SE 22ND AVE  PORTLAND, OR 97202  <a href="mailto:nona.soltero@fredmeyer.com">nona.soltero@fredmeyer.com</a></p>
<p>DOUGLAS C TINGEY  PORTLAND GENERAL ELECTRIC  121 SW SALMON 1WTC1301  PORTLAND, OR 97204  <a href="mailto:doug.tingey@pgn.com">doug.tingey@pgn.com</a></p>	<p>JAY TINKER  PORTLAND GENERAL ELECTRIC  121 SW SALMON ST 1WTC-0306  PORTLAND, OR 97204  <a href="mailto:pge.opuc.filings@pgn.com">pge.opuc.filings@pgn.com</a></p>
<p>MICHAEL T WEIRICH (C)  PUC STAFF--DEPARTMENT OF  JUSTICE  BUSINESS ACTIVITIES SECTION  1162 COURT ST NE  SALEM OR 97301-4096  <a href="mailto:michael.weirich@state.or.us">michael.weirich@state.or.us</a></p>	<p>PACIFICORP, DBA PACIFIC POWER  825 NE MULTNOMAH ST, STE 2000  PORTLAND OR 97232  <a href="mailto:oregondockets@pacificorp.com">oregondockets@pacificorp.com</a></p>

Dated July 31, 2018.



Katie Savarin  
Coordinator, Regulatory Operations

**ATTACHMENT B**

**ENTRIES IN DEFERRED ACCOUNT TO DATE**

**Oregon Deferred Intervenor Funding Grants Summary**  
**Account #187952**  
**Activity through June 2018**

New Funding Grants Paid	Postg Date	Amount	Commission Order	Description
CUB Issue Fund Grant	11/30/2015	11,093.00	UM 1713, Order No. 15-378	Large Customer Energy Efficiency CUB
CUB MSP Fund	11/30/2015	8,884.00	UM 1586 (8), Order No. 15-374	Multi-State Process (MSP) CUB
CUB Issue Fund Grant	11/30/2015	18,440.00	LC 62, Order No. 15-373	2015 Integrated Resource Plan (IRP) CUB
CUB Issue Fund Grant	11/30/2015	8,238.50	UM 1662, Order 15-376	Generic Power Cost Mechanism CUB
ICNU Issue Fund	12/11/2015	9,491.02	UM 1662, Order No. 15-312	Generic Power Cost Mechanism ICNU
CUB Grant Fund	1/11/2016	66,125.00	UM 1357(59)	2016 Funding Grants CUB Fund
ICNU Issue Fund	3/8/2016	7,551.75	UM 1662, Order No. 16-058	Generic Power Cost Mechanism ICNU
ICNU Matching Fund	3/8/2016	43,322.02	UM 1357 (60) Order No. 16-083	2016 preauthorized matching fund ICNU
CUB MSP Fund	4/11/2016	4,760.00	UM 1586(9), Order No. 16-126	Multi-State Process (MSP) CUB
SBUA Issue Fund	6/8/2016	2,236.00	UM 1754, Order No. 16-204	2017-2021 RPIP SBUA
ICNU Issue Fund	6/8/2016	1,452.20	UM 1719, Order No. 16-199	Renewable Generator's Contr to Capacity ICNU
		<u>181,593.49</u>	October 2015-June 2016	
ICNU MSP Fund	7/11/2016	40,000.00	Order 16-252	MSP Fund Grant Request ICNU
CUB Issues Fund	8/10/2016	3,886.00	Order 16-281	Issue Fund Grant Request (UM 1719 Renewable Generator's Contribution to Capacity) CUB
ICNU Issue Fund	9/9/2016	4,634.67	Order 16-310	Issue Fund Grant Request (UM 1754 PAC 2017-21 RPIP) ICNU
CUB MSP Fund	9/23/2016	12,901.00	Order 16-357	MSP Fund Grant Request CUB
CUB Issues Fund	10/27/2016	33,200.00	Order 16-406	Issue Fund Grant Request (UE 307 PAC 2017 TAM) CUB
ICNU Issue Fund	11/23/2016	5,000.00	Order 16-443	Issue Fund Grant Request (UM 1790 PAC 2017-21 RPIP #2) ICNU
SBUA Issue Fund	1/10/2017	1,097.00	Order 17-001	Issue Fund Grant Request (UM 1751 Implementing Energy Storage Guidelines) SBUA
CUB Grant Fund	1/10/2017	66,125.00	Order 17-003	CUB Fund Grant Request (UM 1357(65))
ICNU MSP Fund	1/23/2017	4,080.00	Order 17-015	MSP Fund Grant Request ICNU
ICNU Issues Fund	2/7/2017	24,893.33	Order 16-430	Issue Fund Grant (UE 307 PAC 2017 TAM) ICNU
SBUA Funding Grant	3/8/2017	1,765.00	UM-1790, Order 17-013	Issue Fund Grant Request (UM 1790 PAC 2017-21 RPIP #2) SBUA
ICNU Preauth. Match	3/30/2017	24,669.65	Order 17-094	ICNU Matching Funds Grant
ICNU Issues Fund	4/24/2017	8,768.00	Order 17-143	Issue Fund Grant Request (UE 307 TAM ) ICNU
CUB Issue Fund	6/19/2017	11,745.00	Order 17-183	Issue Fund Grant Request (UE 307 TAM post-order workshops) CUB
		<u>242,764.65</u>	July 2016-June 2017	
CUB Issues Fund	Aug-17	14,000.00	Order No. 17-278	Issue Fund Grant Request (AR 603 Community Solar) CUB
ICNU MSP Fund	Sep-17	36,547.38	Order No. 17-333	MSP Fund Grant Request ICNU
CUB Issues Fund	Sep-17	13,000.00	Order No. 17-334	Issue Fund Grant Request (UE 323 PAC 2018 TAM) CUB
ICNU Issue Fund	Nov-17	12,646.26	Order No. 17-448	Issue Fund Grant Request (UE 323 2018 TAM) ICNU
ICNU Issue Fund	Nov-17	14,313.74	Order No. 17-433	Issue Fund Grant Request (UM 1810 EV Programs) ICNU
ICNU Issue Fund	Nov-17	20,000.00	Order No. 17-437	Issue Fund Grant Request (UM 1824 PAC State Specific Allocation) ICNU
CUB Issues Fund	Nov-17	17,982.96	Order No. 17-442	Issue Fund Grant Request (LC 67 2017 IRP) CUB
CUB Issues Fund	Nov-17	5,548.47	Order No. 17-430	Issue Fund Grant Request (UM 1716 RVOS) CUB
CUB Issues Fund	Nov-17	2,635.94	Order No. 17-422	Issue Fund Grant Request (UM 1824 PAC State Specific Allocation) CUB
CUB MSP Fund	Nov-17	22,407.66	Order No. 17-421	MSP Fund Grant Request CUB
ICNU Issue Fund	Dec-17	16,000.00	Order No. 17-448 and 17-486	Issue Fund Grant Request (UE 323 2018 TAM) ICNU
CUB Issues Fund	Dec-17	10,155.00	Order No. 17-475	Issue Fund Grant Request (UM 1810 EV Programs) CUB
CUB Issues Fund	Dec-17	4,517.04	Order No. 17-498	Issue Fund Grant Request (LC 67 2017 IRP) CUB
CUB MSP Fund	Dec-17	2,592.34	Order No. 17-498	MSP Fund Grant Request CUB
ICNU MSP Fund	Jan-18	25,165.03	Order No. 18-009	MSP Fund Grant Request ICNU
CUB Grant Fund	Jan-18	101,125.00	Order No. 18-020	CUB Fund Grant Request (UM 1929(1))
CUB Issues Fund	Mar-18	1,145.00	Order No. 18-083	Issue Fund Grant Request (UM 1810 EV Programs) CUB
ICNU Matching Fund	Apr-18	22,774.66	Order No. 18-107	ICNU Matching Funds Grant
CUB Issues Fund	Apr-18	5,610.00	Order No. 18-102	Issue Fund Grant Request (UM 1824 PAC State Specific Allocation) CUB
		<u>348,166.48</u>	July 2017-June 2018	