

July 30, 2014

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Public Utility Commission of Oregon
3930 Fairview Industrial Dr. SE
Salem, Oregon 97302-1166

Attn: Filing Center

**RE: Application of Pacific Power
Docket UM 1102(11)**

Enclosed for filing by PacifiCorp d/b/a Pacific Power is an Application for Reauthorization of Deferred Accounting Regarding Intervenor Funding Grants. Also attached is the Notice of Application by PacifiCorp, pursuant to OAR 860-027-0300(3)(e). An original and five copies will be provided via overnight delivery.

The company respectfully requests that data requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

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

Other questions with respect to this filing may be directed to Natasha Siores, Director, Regulatory Affairs & Revenue Requirement at (503) 813-6583.

Respectfully,



R. Bryce Dalley
Vice President, Regulation

Enclosures

cc: UE 263 Service List

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Notice of Application on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

UE 263

OPUC Dockets (W)
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland, OR 97205
dockets@oregoncub.org

G. Catriona McCracken (W) (C)
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland, OR 97205
catriona@oregoncub.org

Melinda J. Davison (W) (C)
Davison Van Cleve PC
333 SW Taylor, Suite 400
Portland, OR 97204
mjd@dvclaw.com

Michael T. Weirich (W) (C)
Department of Justice
Business Activities Section
1162 Court St. NE
Salem, OR 97301-4096
Michael.weirich@state.or.us

Sarah Wallace (W) (C)
Pacific Power
825 NE Multnomah St., Ste. 1800
Portland, OR 97232
Sarah.wallace@pacificorp.com

Deborah Garcia (W) (C)
Marianne Gardner (W) (C)
Oregon Public Utility Commission
PO Box 2148
Salem, OR 97308-2148
deborah.garcia@state.or.us
Marianne.gardner@state.or.us

Douglas C. Tingey (W)
Portland General Electric
121 SW Salmon 1WTC13
Portland, OR 97204
Doug.tingey@pgn.com

Robert Jenks (W) (C)
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland, OR 97205
Bob@oregoncub.org

Irion A. Sanger (W) (C)
Sanger Law PC
1117 SE 53rd Ave
Portland, OR 97215
irion@sanger-law.com

Kevin Higgins (W)
Energy Strategies
215 State St., Suite 200
Salt Lake City, UT 84111-2322
Khiggins@energystrat.com

Oregon Dockets (W)
Pacific Power
825 NE Multnomah St., Suite 2000
Portland, OR 97232
oregondockets@pacificorp.com

Katherine A. McDowell (W) (C)
McDowell Rackner & Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97205
Katherine@mcd-law.com

Greg Bass (W)
Noble Americas Energy Solutions, LLC
401 West A Street, Suite 500
San Diego, CA 92101
gbass@noblesolutions.com

Gregory M. Adams (W)
Richardson & O'Leary
PO Box 7218
Boise, ID 83702
greg@richardsonandoleary.com

Kurt J. Boehm (W)
Jody Kyler Cohn (W)
Boehm Kurtz & Lowry
36 E. Seventh Street, Suite 1510
Cincinnati, OH 45202
kboehm@bkllawfirm.com
jkyler@bkllawfirm.com

Samuel L. Roberts (W) (C)
Hutchinson, Cox, Coons, Orr & Sherlock, P.C.
PO Box 10886
Eugene, OR 97440
sroberts@eugenelaw.com

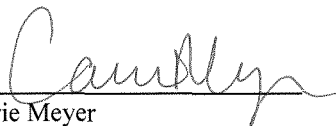
Maja K. Haium (W)
Tracy Rutten (W)
League of Oregon Cities
PO Box 928
Salem, OR 97308
mhaium@orcities.org
trutten@orcities.org

Dated this 30th of July, 2014.

Jay Tinker (W)
Portland General Electric
121 SW Salmon 1WTC-0702
Portland, OR 97204
Pge.opuc.filings@pgn.com

Nona Soltero (W)
Fred Meyer Stores/Kroger
3800 SE 22nd Avenue
Portland, OR 97202
Non.soltero@fredmeyer.com

Steve W. Chriss (W) (C)
Wal-Mart Stores, Inc.
200 I SE IO'h Street
Bentonville, AR 72716
stephen.chriss@wal-mart.com


Carrie Meyer
Supervisor, Regulatory Operations

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1102(11)

In the Matter of the Application of
PACIFICORP for Reauthorization of
Deferred Accounting Regarding Intervenor
Funding Grants.

APPLICATION OF PACIFICORP

1 Pursuant to ORS 757.259 and OAR 860-027-0300, PacifiCorp, d/b/a Pacific Power
2 (or Company), files this application (Application) with the Public Utility Commission of
3 Oregon (Commission) for an order reauthorizing the Company to record and defer, on an
4 ongoing basis, the cost of intervenor funding grants under ORS 757.259(3). The Company
5 respectfully requests reauthorization for a 12-month period commencing August 1, 2014.

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

8 **A. PacifiCorp**

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

13 **B. Statutory Authority**

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

18 //

1 **C. Communications**

2 Communications regarding this Application should be addressed to:

PacifiCorp Oregon Dockets	Etta Lockey
PacifiCorp	Legal Counsel
825 NE Multnomah, Suite 2000	825 NE Multnomah, Suite 1800
Portland, OR 97232	Portland, OR 97232
Telephone: (503) 813-5542	Telephone: (503) 813-5701
E-mail: oregondockets@pacificorp.com	E-mail: etta.lockey@pacificorp.com

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

5 By email (preferred): datarequest@pacificorp.com

6 By regular mail: Data Request Response Center
7 PacifiCorp
8 825 NE Multnomah, Suite 2000
9 Portland, Oregon 97232

10 Informal questions may be directed to Natasha Siores, Director of Regulatory Affairs
11 & Revenue Requirement at (503) 813-6583.

12 **D. Basis for Application**

13 **1. Statutory Authority**

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

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

21 Deferred amounts under ORS 757.259(3) are not subject to the percentage of gross revenues
22 limitation on amortization or other provisions of subsections (5), (6), (7), and (8) of ORS
23 757.259.

24 **2. Commission Approval of the Intervenor Funding Agreement**

1 On July 2, 2003, pursuant to section 2 of the Intervenor Funding Act, the Commission
2 issued Order No. 03-388 in Docket AR 462, which, among other things, approved the
3 Intervenor Funding Agreement among PacifiCorp, Portland General Electric Company,
4 Northwest Natural Gas Company, Northwest Industrial Gas Users, Citizens' Utility Board of
5 Oregon (CUB), and Industrial Customers of Northwest Utilities (ICNU), dated February 5,
6 2003. On December 19, 2007, the Commission issued Order No. 07-564 in Docket UM 1357
7 approving the amended and restated Intervenor Funding Agreement that extended intervenor
8 funding until December 31, 2012. On November 20, 2012, the Commission issued Order No.
9 12-452 in Docket UM 1357 approving the second amended and restated Intervenor Funding
10 Agreement (the Intervenor Funding Agreement) that extended intervenor funding until
11 December 31, 2017. The Intervenor Funding Agreement sets forth the amount of funding to
12 be contributed by each utility and the procedures for budget submittals by intervenors,
13 Commission approval of budgets, and the payment of grants by utilities. Additionally, the
14 Intervenor Funding Agreement allows intervenors to request grants at any time during the
15 calendar year.

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

17 Under the instant docket, the Commission issued a series of orders authorizing
18 PacifiCorp's deferral of Intervenor Funding Agreement costs. The Commission originally
19 authorized deferral of the Intervenor Funding Agreement costs beginning September 17,
20 2003, in Order 03-560. The Commission has reauthorized this deferral annually,¹ most
21 recently in Order No. 13-294, which reauthorized the deferral through July 31, 2014. The

¹ 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), and Order No. 12-364 (entered September 25, 2012).

1 Company seeks reauthorization of this deferral for a 12-month period beginning August 1,
2 2014.

3 **F. Amounts Subject to Deferral**

4 The Company anticipates that the maximum amounts to be deferred during the 12-
5 month period beginning August 1, 2014 will be as shown below.

<u>Fund</u>	
CUB Fund	\$ 66,125
Preauthorized Matching Fund	\$ 66,125
Issue Fund	<u>\$143,750</u>
Total	<u>\$276,000</u>

6 **G. Accounting**

7 The Company proposes to record payment of Intervenor Funding Grants in Account
8 182.3 – Miscellaneous Deferred Debits. In the absence of approval of deferred accounting,
9 the Company would expense the amounts through FERC account 928 – Regulatory
10 Commission Expenses.

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

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

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

16 The Company requests the continuation of deferred accounting in order to seek future
17 recovery of amounts approved pursuant to Order No. 13-294.

18 **J. Use of Sub-accounts**

1 Ordering paragraph 2 of Order No. 10-323, Docket UM 1102, requires the Company
2 to separately account for each type of grant. The Company tracks intervenor funding grants
3 by grant type through different internal order numbers. Issue fund grant amounts paid to
4 ICNU are tracked through internal order number 331374. Issue fund grant amounts paid to
5 CUB are tracked through internal order number 313431. Matching fund grant amounts paid
6 to ICNU are tracked through internal order number 313430. Matching fund grant amounts
7 paid to CUB are tracked through internal order number 313429.

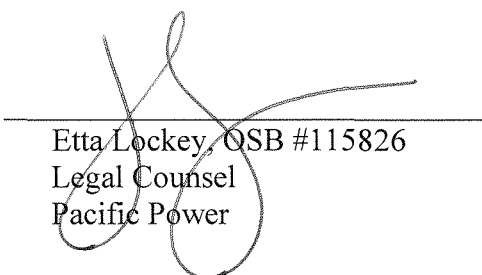
8 **H. Notice**

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

13 WHEREFORE, PacifiCorp respectfully requests that in accordance with ORS
14 757.259(3), the Commission reauthorize the Company to record and defer, on an ongoing
15 basis and commencing as of August 1, 2014, Intervenor Funding Grants incurred by the
16 Company pursuant to the Intervenor Funding Agreement, as described in this Application.

DATED: July 30, 2014.

Respectfully submitted,



Etta Lockett, OSB #115826
Legal Counsel
Pacific Power

ATTACHMENT A

NOTICE

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1102(11)

In the Matter of the Application of
PACIFICORP for Reauthorization of
Deferred Accounting Regarding Intervenor
Funding Grants.

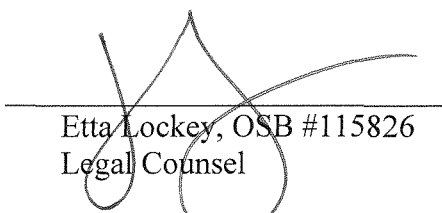
**Notice of Application for Reauthorization to
Defer Intervenor Funding Costs**

On July 30, 2014, 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 Pacific Power'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 Pacific Power's filing should contact the following:

PacifiCorp Oregon Dockets
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (503) 813-5542
E-mail: oregondockets@pacificcorp.com

Any person who wishes to submit written comments to the Commission must do so no later than August 20, 2014.

DATED: July 30, 2014.


Etta Lockey, OSB #115826
Legal Counsel

Pacific Power

ATTACHMENT B

ENTRIES IN DEFERRED ACCOUNT TO DATE

Oregon Deferred Intervenor Funding Grants Summary

Account #187952

Oct 10- June 14

New Funding Grants Paid	Posting Date	Amount	Internal Order No.	Commission Order (if have)	
ICNU Issue Fund	9/16/10	19,003.14	313374	UE 219	SB76, Klamath Dams
CUB Issue Fund Grant	10/11/10	15,740.00	313431	UE 219, Order No. 10-251	SB76, Klamath Dams
CUB Issue Fund Grant	12/16/10	12,191.00	313431	UE 217, Order No. 10-468	2010 GRC
CUB Issue Fund Grant	1/24/11	57,500.00	313431		2012 Funding Grants
ICNU Matching Fund	1/26/11	57,500.00	313430		2012 Funding Grants
ICNU Issue Fund	1/26/11	8,045.24	313374	UE 216, Order No. 11-033	2011 TAM
ICNU Issue Fund	4/19/11	33,960.00	313374	UE 177(4)	SB408 & MCBIT Inc Tax Adj
ICNU Issue Fund	5/12/11	37,724.71	313374	UM 1050, Order No. 11-169	Revised Protocol Allocation Methodology
CUB Issue Fund Grant	6/22/11	2,847.71	313431	(See Below)	
CUB Issue Fund Grant	7/7/11	15,330.00	313431	UM 1050, Order No. 11-198	Revised Protocol Allocation Methodology
ICNU Issue Fund	8/18/11	4,845.00	313374	UE 227, Order No. 11-322	2012 TAM
CUB Issue Fund Grant	9/14/11	(2,847.71)	313431	(Reversal of amount above)	
ICNU Matching Fund	9/26/11	57,500.00	313430	UM 1357	2013 Funding Grants
CUB Issue Fund Grant	11/7/11	13,653.00	313431	UE 227, Order No. 11-418	2012 TAM
CUB Issue Fund Grant	11/16/11	2,500.00	313431	UM 1415, Order No. 11-437	Developing Electric Rate Spreads
CUB Issue Fund Grant	12/19/11	15,580.00	313431	LC 52, Order No. 11-487	2011 IRP
CUB Funding Grant	1/19/12	57,500.00	313429	UM1357(33), Order No. 12-009	2012 Funding Grants
CUB Issue Fund Grant	9/9/12	6,819.00	313431	UE 245, Order No. 12-314	2012 TAM
CUB Issue Fund Grant	9/10/12	35,000.00	313431	UE 246, Order No. 12-315	2012 GRC
ICNU Issue Fund	9/10/12	30,000.00	313374	UE 245, Order No. 12-329	2012 TAM
ICNU Issue Fund	11/23/12	24,000.00	313374	UE 246, Order No. 12-157	2012 GRC
ICNU Matching Fund	11/27/12	57,500.00	313430	UM 1357(37), Order No. 12-462	2013 Funding Grants
CUB Issue Fund Grant	11/27/12	22,711.00	313431	UE 246, Order No. 12-463	2012 GRC
CUB Issue Fund Grant	1/31/13	66,125.00	313431	UM 1357(41), Order No. 13-002	OMAG reclass
ICNU Issue Fund	3/31/13	407.00	313374	UM 1587	Direct Access
ICNU Issue Fund	4/1/13	6,895.65	313374	UM 1570	RPS
CUB Issue Fund Grant	9/18/13	9,274.00	313431	UE 264, Order No. 13-315	2014 TAM

CUB Issue Fund Grant	9/18/13	19,855.81	313431 UE 263, Order No. 13-316	GRC
CUB Issue Fund Grant	9/18/13	2,356.40	313431 UM 1182, Order No. 13-313	Competitive Bidding
CUB Issue Fund Grant	9/18/13	1,785.00	313431 UM 1647, Order No. 13-314	Depreciation Rates
ICNU Issue Fund	10/14/13	28,352.19	313374 UE263, Order No. 13-364	2013 GRC
ICNU Issue Fund	10/14/13	30,248.81	313374 UE264, Order No. 13-365	2014 TAM
CUB Issue Fund Grant	10/14/13	30,270.00	313431 LC57, Order No. 13-368	2013 IRP
ICNU Issue Fund	11/17/13	5,312.12	313374 UM1616, Order No. 13-414	2013 RPS
ICNU Issue Fund	11/17/13	6,995.77	313374 UM1633	Pension Costs in Utility Rates
ICNU Issue Fund	2/9/14	17,388.68	313374 UM 1586(3), Order No. 13-383	MPI (Multi-State Process)
ICNU Issue Fund	2/9/14	5,300.00	313374 UM 1633, Order No. 14-066	Pension Costs in Utility Rates
CUB Issue Fund Grant	2/9/14	8,333.00	313431 UM 1633, Order No. 14-011	Pension Costs in Utility Rates
CUB Issue Fund Grant	2/9/14	66,125.00	313431 UM 1586(4), Order No. 14-007	MPI (Multi-State Process)
CUB Issue Fund Grant	3/9/2014	7,454.00	313431 UM 1586(5), Order No. 14-047	MPI (Multi-State Process)
ICNU Matching Fund	4/21/2014	31,297.65	313430 UM 1357	2014 Funding Grants
ICNU Issue Fund	5/8/2014	8,304.23	313374 UM 1633, Order No. 14-143	Pension Costs in Utility Rates
CUB Issue Fund Grant	6/14/2014	8,333.00	313431 UM 1633, Order No. 14-172	Pension Costs in Utility Rates