

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1586**

In the Matter of	)	
	)	REQUEST FOR A
PACIFICORP, dba PACIFIC POWER	)	MSP ISSUE FUND GRANT &
	)	PROPOSED BUDGET OF THE
Multi-State Process Intervenor Funding	)	OREGON CITIZENS' UTILITY
Agreement.	)	BOARD
_____	)	

The Oregon Citizens' Utility Board (“CUB”) hereby requests a grant of \$50,000 from the Multi-State Process (“MSP”) Fund. The Commission adopted the 4th Amended and Restated MSP Intervenor Funding Agreement (“MSP IFA”) on June 16, 2020 in Order No. 20-189 to provide funding for “MSP Activities.” *See* MSP IFA, Article 1(g). CUB is a “Participating Intervenor” under Article 1(a) of the MSP IFA.

Pursuant to Article 5.1 of the MSP IFA, the proposed budget must identify certain points of information. We provide the information below.

*(a) Statement of the breadth and complexity of the MSP Activities: CUB’s MSP*

Activities include attendance at MSP Workgroup meetings, teleconferences, and the annual Commissioner Forum, in addition to associated communications with MSP participants, review of materials distributed by PacifiCorp or other MSP stakeholders, and any follow-up activity. MSP Activities to date have primarily focused upon alternatives to future system-wide cost allocation methods, including potential coal asset realignment, subscription for new resources, and locational marginal pricing to

allocate power costs. In addition, substantial time has been dedicated to finding ways to accommodate divergent policies among PacifiCorp's six state system, including accommodating Oregon's HB 2021.

*(b) Significance of any policy issues directly attributable to MSP Activities:* The division of costs across the system has significant financial and policy impacts. Retaining the benefits of regional hydro resources within the Northwest is important because the region also bears the costs associated with hydro resources. In addition, DSM investment in Oregon is greater than other states, thus reducing the need for new resources. However, because new generating resources are allocated to the system and DSM is allocated to the state, Oregon is picking up a greater share of load growth of other states than those states are of Oregon's load growth. Also, varying state policies regarding accelerated depreciation or extending the life of coal generating units have created additional issues in allocating the costs and resources of the Company's system. Finally, the treatment of HB 2021 could have significant financial impacts between different PacifiCorp states.

*(c) MSP Activities schedule:* MSP Activities include attendance at MSP Workgroup meetings, teleconferences, and the annual Commissioner Forum, in addition to associated communications with MSP participants, review of materials distributed by PacifiCorp or other MSP stakeholders, and any follow-up activity.

*(d) Participation of other parties in MSP Activities that adequately represent the interests of customers:* CUB represents the interests of PacifiCorp's Oregon residential customers. No other organization adequately represents the interests of PacifiCorp's residential ratepayers in Oregon. Other customer classes may also

benefit from many aspects of our participation.

- (e) *Statement of MSP Activities to be performed by CUB:* CUB staff will keep track of their participation by hours and activity.
- (f) *Description of the areas to be investigated by CUB relating to MSP Activities:* CUB is interested in the extent Oregon is bearing an oversized burden from load growth in other states, and whether Oregon is receiving the benefits of the hydro assets that historically flow to the Northwest. CUB will continue to advocate for the interests of Oregon's residential customers in light of the impacts of SB 1547, and varying state policies throughout PacifiCorp's system.
- (g) *Budget of MSP Activities:* CUB's budget accompanies this document as Attachment A.
- (h) *A Representation of the use of matching funds:* CUB 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 the MSP Activities to be performed for which CUB is seeking an MSP Fund Grant.

Dated this 5th day of July 2023.

Respectfully submitted,



Executive Director  
Oregon Citizens' Utility Board

## **Attachment A**

## CUB Budget -- UM 1586

<b>CUB Internal Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
<i>Staff</i>			
Bob Jenks, Executive Director	\$350	50.00	\$17,500.00
Michael Goetz, Staff Attorney	\$325	45.00	\$14,625.00
Jennifer Hill-Hart	\$325	40.00	\$13,000.00
Will Gehrke, Economist	\$300	30.00	\$9,000.00
Kate Ayres	\$250	10.00	\$2,500.00
John Garrett	\$275	10.00	\$2,750.00
Law Clerk	\$180	10.00	\$1,800.00
Sharif Morton	\$180	7.36	\$1,324.80
<i>Other Expenses</i>			
Printing, Supplies, and Materials			
Travel			
<b>SubTotal</b>			<b>\$62,499.80</b>

<b>In-House Resources</b>		
20% of Eligible Expenses		\$12,500
<b>Total</b>		<b>\$50,000</b>