

**LISA D. NORDSTROM**  
Lead Counsel  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)

July 25, 2017

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Filing Center  
201 High Street SE, Suite 100  
Salem, Oregon 97301


Re: Docket UM 1621(5)  
In the Matter of Idaho Power Company's Request for Authorization for  
Deferral of Costs Associated with Intervenor Funding Grants

Attention Filing Center:

Enclosed for filing in Docket No. UM 1621(5) is an electronic copy of Idaho Power Company's Application for Reauthorization of Deferred Accounting. The Notice of Application for Reauthorization of Deferred Costs Associated with Intervenor Funding Grants is attached to the Application as Attachment A. The Application and Notice have been served on the parties in Docket No. UM 1621 and Idaho Power Company's last general rate case.

If you have any questions, please do not hesitate to contact me or Regulatory Analyst Courtney Waites at (208) 388-5612.

Very truly yours,



Lisa D. Nordstrom  
OSB No. 97352

LDN/kkt

Enclosures

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1621(5)**

In the Matter of  
**IDAHO POWER COMPANY**  
Request for Authorization for Deferral of  
Costs Associated with Intervenor Funding  
Grants.

**APPLICATION FOR  
REAUTHORIZATION OF  
DEFERRED ACCOUNTING**

**I. INTRODUCTION**

Pursuant to ORS 757.259, and OAR 860-027-0300, Idaho Power Company ("Idaho Power" or "Company") applies to the Public Utility Commission of Oregon ("Commission") for an order reauthorizing the Company to defer costs associated with intervenor funding grants pursuant to ORS 757.072 and ORS 757.259(3). Idaho Power requests reauthorization of the deferral of all costs incurred beginning August 1, 2017, and ending July 31, 2018.

In support of this Application, Idaho Power states:

- 1. Idaho Power is a public utility in the state of Oregon and its rates, services, and accounting practices are subject to the regulation of the Commission.
- 2. This Application is filed pursuant to ORS 757.259(3), which allows for deferral of amounts provided as financial assistance under an agreement entered into under ORS 757.072 upon request of the public utility.
- 3. Idaho Power wishes to waive paper service in this docket.

Communications regarding this Application should be addressed to:

|   |  |
|---|--|
| <p>Lisa D. Nordstrom<br/>Idaho Power Company<br/>1221 West Idaho Street (83702)<br/>P.O. Box 70<br/>Boise, Idaho 83707<br/>Telephone: (208) 388-5825<br/>Facsimile: (208) 388-6936<br/><a href="mailto:lnordstrom@idahopower.com">lnordstrom@idahopower.com</a></p> | <p>Regulatory Dockets<br/>Idaho Power Company<br/>1221 West Idaho Street (83702)<br/>P.O. Box 70<br/>Boise, Idaho 83707<br/><a href="mailto:dockets@idahopower.com">dockets@idahopower.com</a></p> |
|---|--|

1 **II. DEFERRAL HISTORY**

2 On February 5, 2016, the Commission issued Order No. 16-028 in UM 1757  
3 approving the Intervenor Funding Agreement (“Agreement”) between Idaho Power and the  
4 Citizens’ Utility Board of Oregon (“CUB”) dated January 1, 2016. Per the terms of the  
5 Agreement, it is effective from January 26, 2016, until December 31, 2020. The Agreement  
6 sets forth the amount of funding available to CUB, the procedures for budget submittals and  
7 funding requests by CUB, Commission approval of budget submittals and funding requests,  
8 and payment of the grants by Idaho Power. The Agreement provides that the Commission  
9 shall allow Idaho Power to recover all amounts paid under the Agreement and provides for  
10 amortization of amounts deferred under the Agreement.

11 Idaho Power filed an application with the Commission in Docket No. UM 1507 for  
12 authorization to defer costs associated with intervenor funding grants for the 12-month  
13 period beginning October 20, 2010. The Commission approved the request in Order No.  
14 10-483. In addition, Idaho Power filed an application with the Commission in UM 1621 for  
15 authorization to defer costs associated with the 12-month period beginning October 20,  
16 2011. The application was approved and adopted by the Commission effective October 20,  
17 2011, in Order No. 12-378. The table below summarizes Idaho Power’s deferred accounting  
18 requests associated with intervenor funding grant costs since a funding agreement has been  
19 in place.

20

| Filing Date | Deferral Period     | Order No. | Approval Date |
|-------------|---------------------|-----------|---------------|
| 09/28/10    |                     | 10-396*   | 10/13/10      |
| 10/20/10    | 10/20/10 – 10/19/11 | 10-483    | 12/20/10      |
| 07/30/12    | 10/20/11 – 08/01/13 | 12-378    | 10/08/12      |
| 07/30/13    | 08/01/13 – 07/31/14 | 13-323    | 09/03/13      |
| 07/24/14    | 08/01/14 – 07/31/15 | 14-298    | 09/02/14      |
| 07/31/15    | 08/01/15 – 07/31/16 | 15-371    | 11/17/15      |
| 07/28/16    | 08/01/16 – 07/31/17 | 16-365    | 09/27/16      |

21  
22  
23  
24  
25 \*CUB Intervenor Funding Agreement approved in UM 1504.

1 Pursuant to the Commission Orders listed above, Idaho Power respectfully requests  
2 an order reauthorizing the deferral for later ratemaking treatment of all payments made by  
3 Idaho Power to CUB between August 1, 2017, and July 31, 2018.

4 **III. OREGON ADMINISTRATIVE RULE 860-027-0300 REQUIREMENTS**

5 The following information is provided pursuant to OAR 860-027-0300(3):

6 **A. Description of Utility Expense or Revenue**

7 For the 12-month period of August 1, 2017, through July 31, 2018, Idaho Power  
8 seeks reauthorization from the Commission to continue accruing, for future amortization as  
9 set forth in the Agreement between Idaho Power and CUB, costs associated with providing  
10 intervenor funding pursuant to ORS 757.072 and Order No. 16-028 to the CUB Fund and  
11 the Issue Fund.

12 **B. Reasons for Deferral**

13 **1. Statutory Authority**

14 ORS 757.072 authorizes the Commission to approve an agreement for intervenor  
15 funding between an energy utility and a customer organization that represents broad  
16 customer interests. ORS 757.259(3) provides that:

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

20 Amounts deferred under this provision are not subject to the amortization caps or earnings  
21 review set forth in Subsections 5, 6, 7, 8, and 10 of ORS 757.259.

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

23 Idaho Power will continue to incur intervenor funding expenses until December 31,  
24 2020, pursuant to the Agreement approved by Commission Order No. 16-028. Idaho Power  
25 wishes to continue to use the deferral mechanism as approved. Idaho Power requests that  
26

1 the deferral continue and that the additional amounts the Company is required to pay to  
2 CUB during the period of August 1, 2017, through July 31, 2018, be treated similarly.

3 **C. Proposed Accounting**

4 Idaho Power proposes to record payment of intervenor funding grants in Federal  
5 Energy Regulatory Commission ("FERC") Account 182.3, Other Regulatory Assets. In the  
6 absence of a deferred accounting order from the Commission, Idaho Power would continue  
7 to record costs associated with the intervenor funding expenses to FERC Account 928.3,  
8 Regulatory Commission Expenses.

9 **D. Estimate of Amounts Subject to Deferral**

10 The Company anticipates the maximum amount deferred during each calendar year  
11 will be \$63,000—consisting of \$31,500 for the CUB Fund and \$31,500 for the Issue Fund  
12 pursuant to Section 4.2 of the Agreement, plus any rollover amounts permitted by Section  
13 4.3 of the Agreement. Deferred amounts will accrue interest at Idaho Power's authorized  
14 rate of return. Based on this estimate for the August 1, 2017, through July 31, 2018, time  
15 period and those expenses deferred since amortization of prior deferred intervenor funding  
16 amounts began on June 1, 2017, Idaho Power estimates the total of the account balances  
17 associated with intervenor funding paid to CUB will be approximately \$66,550.

18 The Agreement permits CUB to request grants from the funds at any time during the  
19 calendar year, though the deferral period runs August 1 to July 31. Amounts will be debited  
20 to the deferral account as the funds are actually disbursed. Balances in the CUB Fund and  
21 the Issue Fund may rollover into the following year if CUB does not use the entire amount  
22 available, and the CUB Fund permits CUB to request advances from future-year funds.  
23 Pursuant to the terms of the Agreement, the CUB Fund Grants will be charged to and paid  
24 for by the residential customer class.

25

26

1 **E. Notice**

2 A copy of the Notice of Application for Reauthorization of Deferred Costs Associated  
3 with Intervenor Funding Grants is attached to this Application pursuant to OAR 860-027-  
4 0300 as Attachment A. The Application and Notice will be served on the parties in Docket  
5 No. UM 1621 and Idaho Power's last general rate case.

6 **IV. OREGON ADMINISTRATIVE RULE 860-027-0300(4) REQUIREMENTS**

7 **A. Entries in the Deferred Account as of June 30, 2017**

8 Effective June 1, 2017, with Order No. 17-198, the Commission approved  
9 amortization of \$112,004 in CUB intervenor funding amounts, leaving a balance of  
10 \$3,551.82 in the deferral account. Attached to this Application as Attachment B is a  
11 description and explanation of the entries in this deferred account as of June 30, 2017.

12 **B. Reason for Continuation of Deferred Accounting**

13 Idaho Power is seeking approval to continue the intervenor funding deferral pursuant  
14 to Commission Order No. 16-028 as described in Section II above.

15 **V. SUMMARY OF FILING CONDITIONS**

16 The following is information related to future amortization:

17 **A. Earnings Review**

18 None required. Amounts deferred under ORS 757.259 are not subject to the  
19 amortization caps or earnings review set forth in Subsections 5, 6, 7, 8, and 10 of ORS  
20 757.259.

21 **B. Prudence**

22 A prudence review will be performed prior to amortization.

23 **C. Sharing (Percents)**

24 None applicable.

25

26

1 **D. Rate Spread/Rate Design**

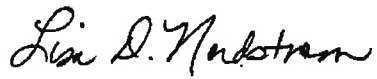
2 Please see Section III.D above.

3 **VI. CONCLUSION**

4 Idaho Power respectfully requests that, consistent with ORS 757.259(3) and Order  
5 No. 16-028, the Commission authorize the Company to record and defer additional  
6 intervenor funding grants incurred by the Company pursuant to the Agreement beginning  
7 August 1, 2017, and ending July 31, 2018.

8 DATED: July 25, 2017.

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26



---

LISA D. NORDSTROM  
Attorney for Idaho Power Company

**Attachment A**

**Notice of Application for Reauthorization  
of Deferred Costs Associated with  
Intervenor Funding Grants**



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1621(5)**

In the Matter of  
  
IDAHO POWER COMPANY  
  
Request for Authorization for Deferral of Costs  
Associated with Intervenor Funding Grants.

**NOTICE OF APPLICATION FOR  
REAUTHORIZATION OF DEFERRED  
COSTS ASSOCIATED WITH  
INTERVENOR FUNDING GRANTS**

On July 25, 2017, Idaho Power Company ("Idaho Power") filed an application with the Public Utility Commission of Oregon ("Commission") for an order authorizing deferral of intervenor funding grants pursuant to ORS 757.259(3), ORS 757.072, and Order No. 16-028.

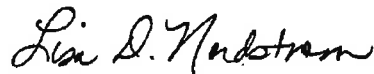
Approval of Idaho Power's Application will not authorize a change in Idaho Power's rates but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

Idaho Power's Application will be posted on the Commission website for persons who wish to obtain a copy or they may contact the following:

Lisa D. Nordstrom  
Idaho Power Company  
1221 West Idaho Street (83702)  
P.O. Box 70  
Boise, Idaho 83707  
Telephone: (208) 388-5825  
Facsimile: (208) 388-6936  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)

Any person who wishes to submit written comments to the Commission on Idaho Power's Application must do so no later than August 25, 2017.

DATED: July 25, 2017.



---

LISA D. NORDSTROM  
Attorney for Idaho Power Company

**ATTACHMENT B**

**Funding Grants Monthly Entries**

**INTERVENOR FUNDING DEFERRED ACCOUNT MONTHLY ENTRIES**

| Account | DB2DATE    | DISTDESC                          | Descr                     | TOTAMT          |
|---------|------------|-----------------------------------|---------------------------|-----------------|
| 182385  | 12/31/2015 | BALANCE OF INT FUNDING TO NEW ACC | INT FUNDING TO NEW ACCT   | 5,472.81        |
| 182385  | 2/29/2016  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 35.38           |
| 182385  | 2/29/2016  | CUB FUND GRANT                    | CUB FUND GRANT            | 31,500.00       |
| 182385  | 3/31/2016  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 137.30          |
| 182385  | 4/30/2016  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 239.67          |
| 182385  | 5/31/2016  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 240.89          |
| 182385  | 6/30/2016  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 242.44          |
| 182385  | 7/31/2016  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 244.00          |
| 182385  | 8/31/2016  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 245.58          |
| 182385  | 8/31/2016  | CUB ISSUE FUND 16-281             | CARRYING CHARGES          | 1,944.00        |
| 182385  | 8/31/2016  | CUB ISSUE FUND 16-284             | CARRYING CHARGES          | 30,000.00       |
| 182385  | 8/31/2016  | CUB ISSUE FUND 16-285             | CARRYING CHARGES          | 7,784.00        |
| 182385  | 9/30/2016  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 375.56          |
| 182385  | 10/31/2016 | CUB FUNDING INTEREST              | CARRYING CHARGES          | 505.98          |
| 182385  | 11/30/2016 | CUB FUNDING INTEREST              | CARRYING CHARGES          | 508.82          |
| 182385  | 12/31/2016 | CUB FUNDING INTEREST              | CARRYING CHARGES          | 512.10          |
| 182385  | 1/31/2017  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 515.40          |
| 182385  | 1/31/2017  | CUB FUND GRANT 17-006             | CUB FUND GRANT            | 31,500.00       |
| 182385  | 2/28/2017  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 620.54          |
| 182385  | 3/31/2017  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 726.02          |
| 182385  | 4/30/2017  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 730.37          |
| 182385  | 5/31/2017  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 735.08          |
| 182385  | 6/30/2017  | CUB FUNDING INTEREST              | CARRYING CHARGES          | 739.81          |
| 182385  | 6/30/2017  | CUB FUND FOR AMORTIZATION         | Rate Related Amortization | (112,003.93)    |
|         |            |                                   |                           | <u>3,551.82</u> |