

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: November 17, 2015

REGULAR _____ CONSENT X EFFECTIVE DATE November 1, 2015

DATE: November 10, 2015

TO: Public Utility Commission

FROM: Mitchell Moore *MPM*

THROUGH: *J* Jason Eisdorfer and Marc Hellman *A*

SUBJECT: IDAHO POWER COMPANY: (Docket No. UM 1621(3)) Requests reauthorization to defer costs related to Intervenor Funding Grants.

STAFF RECOMMENDATION:

I recommend the Commission approve Idaho Power Company's (Idaho Power or Company) request for reauthorization to defer costs related to intervenor funding grants effective November 1, 2015.

ISSUE:

Idaho Power requests reauthorization to record and defer for a 12-month period beginning November 1, 2015, the cost of intervenor funding grants as allowed under ORS 757.072.

Deferral of these costs was originally granted by the Commission in Order No. 10-396 and has been annually reauthorized, most recently by Order No. 14-298.

APPLICABLE LAW:

This request is made pursuant to ORS 757.259 and OAR 860-027-0300, which allows a deferral of expenses provided as financial assistance under an agreement entered into under ORS 757.072 for later incorporation in rates.

STAFF ANALYSIS:

In its Order No. 10-396, the Commission approved an Intervenor Funding Agreement (IFA) between Idaho Power and the Citizens Utility Board (CUB). The IFA sets forth the funding amount to be contributed by the utility, the procedures for budget submittals by intervenors, Commission approval of budgets, and the payment of grants by the Company. It authorizes two funds with different qualification requirements for each. They are the CUB Fund and the Issue Fund.

The Commission rules require the costs of intervenor funding to be allocated to the appropriate customer class, to align the costs of advocacy with the intended beneficiaries of the advocacy. Under the IFA, only CUB is eligible to receive an Issue Fund grant, and must submit proposed budgets for the Commission review and approval.

The current IFA is in effect through December 31, 2015, and the parties will need to file a renewed or updated agreement with the Commission in order for CUB to be eligible to recover intervenor expenses after that date.

Reason for Deferral

In accordance with OAR 860-027-0300(4)(b), the Company requests continuation of deferred accounting to recover amounts approved pursuant to Order No. 10-396.

Proposed Accounting

Amounts are to be debited to deferred accounts only as the utility disburses funding to a qualifying intervenor. The proposed deferrals would be recorded in FERC subaccount Account 182.3, Other Regulatory Assets. Absent the Commission's authorization of deferred accounting, the Company would incur the cost of an intervenor funding grant.

Current Deferral Activity

In accordance with OAR 860-027-0300(4)(a), Idaho Power provided the following information regarding the accumulated deferred amounts to the date of this application. The Company will begin incorporating this deferred balance into rates beginning January 1, 2016.¹

Docket/Order No.	Order Date	Fund Type	Amount
UM 1415 / 11-437	11/09/11	Issue Fund	\$14,351
UM 1504(3) / 12-008	01/13/12	CUB Fund	40,458
UE 222 / 12-113	03/28/12	Issue Fund	2,810
UE 233 / 12-115	03/28/12	Issue Fund	30,890
LC 53 / 12-336	09/02/12	Issue Fund	6,805
UE 248 / 12-464	11/29/12	Issue Fund	3,843
UM 1504(4) / 13-001	01/14/13	CUB Fund	37,443
UM 1582 / 13-289	08/06/13	Issue Fund	8,458
UM 1182 / 13-313	09/03/13	Issue Fund	2,794
UM 1653 / 13-468	12/12/13	Issue Fund	5,629
UM 1633 / 14-011	01/09/14	Issue Fund	9,630
UM 1504(5) / 14-010	01/09/14	CUB Fund	34,665
UM 1633 / 14-172	05/21/14	Issue Fund	9,386
LC 58 / 14-228	06/18/14	Issue	12,758
UE 279	08/04/14	Issue	4,487
UM 1504	01/07/15	CUB	32,094
UE 293	06/05/15	Issue	16,215
TOTAL	7/31/15	CUB/Issue	\$272,716

Estimated Deferrals in Authorization Period

At the time of its application, Idaho Power estimated that the maximum deferred amounts during the 12-month period beginning August 1, 2015 will be as shown in the table below. The IFA permits CUB to request grants from the funds at any time during the calendar year, though the deferral period runs August 1 to July 31. Depending on the Commission's decision regarding approval of a renewed or amended IFA, these amounts may change.

Fund	Amount
CUB Fund	30,000
Issue Fund	30,000
Total	\$60,000

¹ Staff noticed that the deferred balance had become unusually large relative to the number of Oregon customers. After discussion with the Company, the Company agreed to begin amortization of the balance January 1, 2016. Staff and the Company are still in discussion regarding the appropriate amortization period.

Idaho Power UM 1621(3)
November 10, 2015
Page 4

CONCLUSION:

As Idaho Power's filing meets the requirements of the IFA, ORS 757.259 and OAR 860-027-0300, I recommend the Commission approve the application.

PROPOSED COMMISSION MOTION:

Idaho Power's application to defer the costs associated with intervenor funding grants for the 12-month period beginning August 1, 2015, be approved.

IP UM 1621(3) Intervenor Funding Deferral.docx