

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 399, UM 1964, UM 2134, UM 2142, UM 2167, UM 2185, UM 2186, UM 2201

IN THE MATTER OF: )  
)  
PACIFICORP DBA PACIFIC POWER ) PROPOSED BUDGET OF SMALL  
) BUSINESS UTILITY ADVOCATES  
Request for General Rate Revision )  
(UE 399), )  
)  
Application for Approval of Deferred )  
Accounting for a Balancing Account )  
Related to the Transportation Electrification )  
Program (UM 1964), )  
)  
Application to Defer Costs Related to )  
Cedar Springs II (UM 2134), )  
)  
Application for Approval of Deferred )  
Accounting for Cholla Unit 4-Related )  
Property Tax Expense (UM 2142), )  
)  
Application for Approval of Deferred )  
Accounting for Revenues Associated with )  
Renewable Energy Credits from Pryor )  
Mountain, (UM 2167), )  
)  
Application for Approval of Deferred )  
Accounting and Accounting Order Related )  
To Non-Contributory Defined Benefit )  
Pension Plans (UM 2185), )  
)  
Application for Approval of Deferred )  
Accounting for Costs Related to a )  
Renewable Resource Pursuant to ORS )  
469A.120 (UM 2186), and )  
)  
Alliance of Western Energy Consumers, )  
Application for an Accounting Order )  
Requiring PacifiCorp to Defer Fly Ash )  
Revenues (UM 2201). )  
\_\_\_\_\_ )

## **1. INTRODUCTION**

Pursuant to the Administrative Law Judge (“ALJ”) April 4, 2022 Procedural Conference Memorandum in this matter, Small Business Utility Advocates (“SBUA”) submits this Proposed Budget of SBUA (“Proposed Budget”) in the event the Commission grants the Petition for Case Certification of Small Business Utility Advocates filed April 13, 2022. This Proposed Budget is required pursuant to Section 6.3 Fourth Amended and Restated Intervenor Funding Agreement, approved by Order 18-017 (“Agreement”)(Implementing ORS 757.072 and OAR 860-001-0120 and 860-001-0130). SBUA submits this Proposed Budget to assist SBUA in representing small commercial customers of PacifiCorp dba Pacific Power (“Company”) in this general rate case.

## **2. REQUIREMENTS FOR AN ISSUE FUND GRANT PROPOSED BUDGET**

The Proposed Budget must include: (a) a statement of work to be performed by the applicant for which the applicant is seeking an Issue Fund Grant; (b) a description of the areas to be investigated by the intervenor; (c) a description of the particular customer class or classes that will benefit from the intervenor's participation; (d) identification of the specific account or accounts from which the intervenor is seeking an Issue Fund Grant and an estimate of the amount of available funds in that account; (e) a budget showing estimated attorney fees, which may include the cost for appropriate support staff and operational support; (f) a budget showing estimated consultant fees and expert witness fees, which may include the cost for appropriate support staff and operational support; and (g) a representation that the intervenor 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 work to be performed for which the intervenor is seeking an Issue Fund Grant.<sup>1</sup>

**(a) A statement of work to be performed by the applicant for which the applicant is seeking an Issue Fund Grant.**

SBUA represents small business including small commercial customers in this docket. SBUA will participate in events identified in the ALJ April 4, 2022 Procedural Conference Memorandum including settlement conferences and other meetings, providing testimony, legal briefings, data requests and responses, and hearing. SBUA will be assisted by expert, William A. Steele, who served SBUA in the Company's directly previous rate case, UE 374.

**(b) A description of the areas to be investigated by the applicant.**

To ensure fair and reasonable rates for small businesses, SBUA would review return on equity and capital structure, justification for the base change of 10.3% with a net change of 9.5% to Schedule 23 rates. SBUA would also review cost allocation methods used by the Company that affect small business, and rate spread and rate design, particularly as impacts small commercial customers. In addition, SBUA would review the deferred accounting regarding costs for Transportation Electrification program (docket UM 1964) recently consolidated in this general rate case pursuant to the April 11, 2022 ALJ Ruling "Disposition: Motion to Consolidate Granted in Part; Denied in Part". SBUA reserves the right to review other issues raised by the Company or by other parties.

---

<sup>1</sup> Section 6.3 Fourth Amended and Restated Intervenor Funding Agreement, approved by Order 18-017.

**(c) A description of the particular customer class or classes that will benefit from the intervenor's participation.**

The particular customer classes that would benefit from SBUA's participating in the proceeding is the Schedule 23 General Service — Small Nonresidential.<sup>2</sup>

**(d) Identification of the specific account or accounts from which the intervenor is seeking an Issue Fund Grant and an estimate of the amount of available funds in each account.**

The accounts from which SBUA seeks Issue Fund grant is PacifiCorp dba Pacific Power: at the time of preparing this Proposed Budget the amount remaining in the Issue Fund Grant was not available.<sup>3</sup>

**(e), (f), and (g) require a budget showing estimated attorney fees, which may include the cost for appropriate support staff and operational support, a budget showing estimated consultant fees and expert witness fees, which may include the cost for appropriate support staff and operational support, and a representation that the intervenor 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 work to be performed for which the intervenor is seeking an Issue Fund Grant.**

In response to these requirements “e”, “f”, and “g”, SBUA submits the attached UE 399 Proposed Budget of SBUA Exhibit A as a Budget for the Issue Fund Grant requested.

---

<sup>2</sup> UE 399 PacifiCorp dba Pacific Power Request for General Rate Revision, filed

<sup>3</sup> SBUA requested this information of the designated PUC Staff on April 26, 2022 but has not yet received response.

Pursuant to the Commission's Order 19-262, SBUA submits for *in camera* review only by the Commission's designee a UE 399 Confidential Attachment 1: Statement of Financial Position for 2022 of SBUA in Oregon.

**3. CONCLUSION**

SBUA submits the information above and attached as its Proposed Budget to assist its representation of the Company's General Service Small Nonresidential ratepayers in Oregon.

RESPECTFULLY SUBMITTED April 28, 2022.



s/ Diane Henkels

---

Diane Henkels  
Attorney, Small Business Utility Advocates  
[www.utilityadvocates.org](http://www.utilityadvocates.org)  
621 SW Morrison St. Ste 1025  
Portland, OR 97205  
541-270-6001  
[diane@utilityadvocates.org](mailto:diane@utilityadvocates.org)



UE 399

EXHIBIT A

SBUA Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Attorney	30	\$225	\$6,750
Associate attorney	10	\$190	\$1,900
Administrator/paralegal	10	\$75	\$750
Expert Witness	75	\$150	\$11,250
Executive Director	2	\$250	\$500
<i>Other Expenses</i>			
Travel — Expert			\$0
Other — printing/postage			\$20
Subtotal			\$21,170
20% of SBUA Funded Expenditures			\$4,234
Total SBUA Issue Fund Grant Proposed Request			\$16,936

