

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 314**

|                                       |   |                          |
|---------------------------------------|---|--------------------------|
| In the Matter of                      | ) |                          |
|                                       | ) | CUB REQUEST FOR AN ISSUE |
| IDAHO POWER COMPANY,                  | ) | FUND GRANT & PROPOSED    |
|                                       | ) | BUDGET                   |
| 2017 Annual Power Cost Update (APCU). | ) |                          |
| <hr/>                                 | ) |                          |

The Oregon Citizens' Utility Board (“CUB”), estimates eligible expenses of \$6,000, before the 20% match, for docket UE 314. CUB requests a grant of \$4,800 from the 2017 Idaho Power Issue Fund. CUB staff have been tracking their participation in this docket by hours and activity.

CUB is pre-certified per OAR 860-012-0100(3)(a). UE 314 is an eligible proceeding under the 2016-2020 Intervenor Funding Agreement (“IFA”) between Idaho Power Company and the Oregon Citizens’ Utility Board, as approved by the Oregon Public Utility Commission in Order No. 16-028, entered January 26, 2016. The proceeding directly affects Idaho Power, which is a participating public utility under the IFA. *See* IFA at Article 1(h). CUB filed its Notice of Intent to Request an Issue Fund Grant on June 29, 2017.

CUB also requests a waiver of IFA Article 6.3, which sets the deadline for submitting proposed budgets 30 days after the prehearing conference at which the schedule for the proceeding is established or by such other date as the Commission designates. The deadline for proposed budgets in UE 314 was December 9, 2016. CUB

does not believe that any party is harmed by its delayed request for an issue fund grant in this case.

Pursuant to paragraph 6.3 of the IFA, the proposed budget must identify certain points of information. CUB provides the information below.

*(a) Statement of Work to Be Performed:* CUB intends to participate in every procedural aspect of this case. CUB will participate in the prehearing conference, all workshops, and settlement meetings. We will pursue discovery of Idaho Power through data requests, and we will participate in drafting a stipulation.

*(b) Description of Areas to Be Investigated:* CUB will investigate issues including, but not limited to:

1. Idaho Power's cost of coal supply and shipment;
2. Hydro conditions and their effect on power costs;
3. Purchase power and sales for resale;
4. Rate spread; and
5. Issues raised by other parties to this proceeding.

*(c) Description of the Class or Classes Benefiting from CUB's Participation:*

CUB represents the interests of Idaho Power's residential customers, though other customer classes may benefit from many aspects of our participation.

*(d) The Fund from Which CUB Seeks an Issue Fund Grant & Available Funds:* Given that the balance of the 2017 Idaho Power Issue Fund is \$45,056, CUB is seeking a \$4,800 grant. CUB's budget shows eligible expenses of \$6,000, but CUB limits its request in this case to \$4,800. CUB respectfully requests that the Commission approve CUB's request for a \$4,800 grant from the 2017 Idaho Power Issue Fund.

(e) *The Budget Showing Estimated Fees and Costs:* CUB's budget accompanies this document as Attachment A.

(f) *A Representation of the Use of Matching Funds:* The budget and an accounting for the use of matching funds accompany this document as Attachment A.

Dated this 29<sup>th</sup> day of June, 2017.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bob Jenks", written in a cursive style.

Bob Jenks  
Executive Director  
Oregon Citizens' Utility Board

## CUB Proposed Budget -- UE 314

| <b>CUB Internal Expenses</b>     | <b>Rate</b> | <b>Hours</b> | <b>Cost</b>    |
|----------------------------------|-------------|--------------|----------------|
| <i>Staff</i>                     |             |              |                |
| Michael Goetz, Staff Attorney    | \$175       | 6.00         | \$1,050.00     |
| Jaime McGovern, Senior Economist | \$225       | 20.00        | \$4,500.00     |
| Sarah Ryan-Knox, Paralegal       | \$75        | 6.00         | \$450.00       |
| <hr/>                            |             |              |                |
| <b>In-House Resources</b>        |             |              |                |
| <hr/>                            |             |              |                |
| 20% of Eligible Expenses         |             |              | (\$1,200)      |
| <b>Total</b>                     |             |              | <b>\$4,800</b> |