

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1633**

In the Matter of	)	
	)	CUB REQUEST FOR
PUBLIC UTILITY COMMISSION OF	)	FUND GRANTS & PROPOSED
OREGON	)	BUDGET
	)	
Investigation into Treatment of Pension	)	
Costs in Utility Rates	)	
_____	)	

The Citizens' Utility Board of Oregon (“CUB”) requests a total grant of \$50,000 split among Avista Utilities’ (“Avista”), Cascade Natural Gas Corporation’s (“CNGC”), NW Natural’s, Portland General Electric’s (“PGE”), Idaho Power Company’s (“Idaho Power”) and PacifiCorp’s respective Issue Funds. This presumes a fully litigated case; settlement of some or all of the issues would likely reduce our total request for reimbursement. CUB staff will keep track of their participation by hours and activity.

CUB is pre-certified per OAR 860-001-0120(3)(a). UM 1633 is an eligible proceeding under the Second Amended and Restated Intervenor Funding Agreement (“IFA”),<sup>1</sup> and the Idaho Power-CUB Intervenor Funding Agreement (“Idaho Power IFA”).<sup>2</sup> This proceeding directly affects Avista, CNGC, NW Natural, PGE, Idaho Power and PacifiCorp, which are all participating public utilities under their respective

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<sup>1</sup>The Second Amended and Restated Intervenor Funding Agreement was approved by the Commission in Order No. 12-452 (Nov. 20, 2012).

<sup>2</sup>The Idaho Power-CUB Intervenor Funding Agreement was approved by the Commission in Order No. 10-396 (Oct. 13, 2010).

intervenor funding agreements. *See* IFA, Article 1(k); Idaho Power IFA, Article 1(h). CUB filed its Notice of Intent to Request an Issue Fund Grant concurrent with its Notice of Intervention, as required by the intervenor funding agreements. *See* IFA, Article 6.2; Idaho Power IFA, Article 6.2

Pursuant to Article 6.3 of the IFA and Article 6.3 of the Idaho Power IFA, the proposed budget must identify certain points of information. We provide the information below.

*(a) Statement of Work to Be Performed:* CUB intends to participate in every procedural aspect of this case. We have participated in the pre-hearing conference, two workshops and a Commission presentation thus far. We will attend, either in person or by phone, and participate in all or most workshops, settlement meetings, hearings, and additional Commission presentations as they may be scheduled in this docket. CUB will review and analyze any comments or testimony, and/or briefs filed by other parties. We will pursue discovery through data requests, and will respond to data requests asked of us as appropriate. We will file comments or testimony, and/or briefs, and present our recommendations to the Commission, including any proposed modifications or conditions as appropriate.

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

- A. The appropriate regulatory treatment of pension expense;
- B. 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 Avista's, CNGC's, NW Natural's, PGE's, Idaho

Power's and PacifiCorp'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:* CUB is seeking a collective issue fund grant of \$50,000 from the Avista Issue Fund, CNGC Issue Fund, NW Natural Issue Fund, PGE Issue Fund, Idaho Power Issue Fund and the PacifiCorp Issue Fund. CUB proposes to allocate approximately one-sixth of the costs in this proceeding to each utility. Accordingly, CUB requests that this grant budget be broken down in the following manner: \$8,334 from the Avista Issue Fund; \$8,333 from the CNGC Issue Fund; \$8,333 from the NW Natural Issue Fund; \$8,333 from the PGE Issue Fund; \$8,334 from the Idaho Power Issue Fund; and \$8,333 from the PacifiCorp Issue Fund. As of February 26, 2013, the Avista Issue Fund had an uncommitted balance of approximately \$69,000; the CNGC Issue Fund had an uncommitted balance of approximately \$51,752; the NW Natural Issue Fund had an uncommitted balance of approximately \$67,056; the PGE Issue Fund had an uncommitted balance of approximately \$229,281; the Idaho Power Issue Fund had an uncommitted balance of approximately \$60,000; and the PacifiCorp Issue Fund had an uncommitted balance of approximately \$140,476.

*(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 20<sup>th</sup> day of March, 2013  
Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bob Parks". The signature is fluid and cursive, with a long horizontal stroke at the end.

Executive Director  
Citizens' Utility Board of Oregon

Attachment A

**CUB Budget - UM 1633**

<b>CUB Internal Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
<i>Staff</i>			
Bob Jenks, Executive Director	\$250	80	\$20,000
Catriona McCracken, General Counsel	\$250	90	\$22,500
SA Anders, Business and Projects Mgr	\$75	2	\$150
Erin Scheurer, Law Clerk	\$75	15	\$1,125
Nadine Hanhan, Utility Analyst	\$125	50	\$6,250
Sommer Templet, Staff Attorney	\$175	70	\$12,250

*Other Expenses*

Printing & Mailing			\$75
Travel			\$150

**In-House Resources**

20% of Eligible Expenses			(\$12,500)
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**Total**

**\$50,000**

**Per-Utility Request:**

Avista Utilities			\$8,334.00
Cascade Natural Gas Company			\$8,333.00
NW Natural			\$8,333.00
Idaho Power Company			\$8,334.00
Portland General Electric			\$8,333.00
PacifiCorp			\$8,333.00

## UM 1633 – CERTIFICATE OF SERVICE

I hereby certify that, on this 20<sup>th</sup> day of March, 2013, I served the foregoing **CUB REQUEST FOR FUND GRANTS & PROPOSED BUDGET** in docket UM 1633 upon each party listed in the UM 1633 PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

**(W denotes waiver of paper service)**

**(C denotes service of Confidential material authorized)**

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Respectfully submitted,



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