#### BEFORE THE PUBLIC UTILITY COMMISSION

### **OF OREGON**

#### **UM 1633**

In the Matter of	) SECOND AMENDMENT OF PROPOSED BUDGET OF THE
PUBLIC UTILITY COMMISSION OF OREGON	) CITIZENS' UTILITY BOARD OF ) OREGON
Investigation into Treatment of Pension Costs in Utility Rates	) ) ) _)

Pursuant to Article 6.7 of the Second Amended and Restated Intervenor Funding Agreement ("IFA")<sup>1</sup> and Article 6.6 of the Idaho Power Intervenor Funding Agreement ("Idaho Power IFA"),<sup>2</sup> the Citizens' Utility Board submits this Amendment of Proposed Budget in docket UM 1633. CUB requests issue funds from the following utilities: Cascade Natural Gas Corporation's ("CNGC"), NW Natural, Portland General Electric ("PGE"), Idaho Power Company ("Idaho Power") and PacifiCorp. CUB is automatically precertified under Article 5.2 of the IFA, Article 5.1 of the Idaho Power IFA, and OAR 860-001-0120(3)(a).

On March 20, 2013, CUB submitted a proposed budget showing eligible expenses of \$62,500 and seeking an Issue Fund Grant in the amount of \$50,000. On March 27, 2013, in Order No. 13-108, the Commission approved CUB's budget. On January 6, 2014, CUB filed a request for a progress payment in the amount of \$50,000, which was approved by the Commission in Order No. 14-001. On February 6, 2014, CUB filed a request to amend its proposed budget issue fund grant. The Commission approved CUB's request on February 18, 2014 in OPUC Order No. 14-046. On May 15, 2014, CUB filed a request for a progress payment in this docket, noting that it may further amend its budget and request additional funds at a later date due to the ongoing nature of the docket. The Commission approved CUB's request for a progress payment on May 21, 2014 in OPUC Order No. 14-172.

CUB is now proposing to further amend its budget in docket UM 1633 for staff time spent on UM 1633 in 2015 only. CUB's second amended request shows total eligible expenses of \$162,500, and seeking a total issue fund grant of \$130,000 to be

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

allocated among the participating utilities that have funds remaining in their respective 2015 issue funds. Due to the extended nature of this proceeding, CUB is requesting that the additional \$30,000 be granted for work done in 2015 and funded by each company's 2015 issue fund. CUB proposes to allocate the additional funds as follows: \$8,000 from the 2015 NW Natural Issue Fund; \$3,000 from the 2015 CNGC Issue Fund; \$8,000 from the 2015 PGE Issue Fund; \$3,000 from the 2015 Idaho Power Issue Fund; and \$8,000 from the 2015 PacifiCorp Issue Fund.<sup>3</sup>

Section 6.7 of the IFA states:

<u>Amendment of Proposed Budget</u>: At any time during the proceeding, an intervenor who received Commission approval for an Issue Fund Grant may file to amend its budget and request additional funding due to unforeseen changes in the scope or complexity of issues, positions taken by other parties, changes in the schedule of the case, or other good cause.<sup>4</sup>

There is good cause to support approving CUB's proposed budget amendment. UM 1633 has presented CUB with a vast and complex set of issues, facts and analysis that CUB did not expect when it filed its original budget request in this docket. Additionally, as this docket has changed in scope and complexity, its schedule has changed to include additional workshops, testimony and briefing that were not anticipated at the beginning of this case. In 2015, CUB has drafted and submitted a pre-hearing brief, cross-examination statements and exhibits, and must still prepare for a hearing and oral argument, and draft legal briefs. Each of these tasks will require substantial additional time and resources. Therefore, CUB is seeking to increase its approved budget to \$130,000. CUB's amended budget accompanies this document as Attachment A.

Respectfully submitted, February 20, 2015

Bob Jenks

**Executive Director** 

Citizens' Utility Board of Oregon

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Enclosures: Attachment A

<sup>3</sup> CUB is not seeking an issue fund grant from Avista's 2015 Issue Fund due to outstanding requests in other dockets.

<sup>&</sup>lt;sup>4</sup> Section 6.6 of the Idaho Power IFA contains substantially the same language and identical requirements to those contained in Section 6.7 of the IFA.

# **Attachment A**

# **CUB Amended Budget - UM 1633**

CUB Internal Expenses	Rate	Hours	Cost
Staff			
Bob Jenks, Executive Director	\$250	170	\$42,500
Catriona McCracken, General Counsel	\$250	200	\$50,000
Jaime McGovern, Sr. Economist	\$225	210	\$47,250
Nadine Hanhan, Utility Analyst	\$125	38	\$4,750
Sommer Templet, Staff Attorney	\$175	100	\$17,500
Other Expenses Printing & Mailing Travel			\$200 \$300
In-House Resources 20% of Eligible Expenses			(\$32,500)
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## **Total**

\$130,000

Per-Utility Request:	Prior Requests		2015 Request		Total Request
Avista Utilities	\$	16,668.00		\$0*	\$16,668.00
Cascade Natural Gas Company	\$	16,666.00	\$	3,000.00	\$19,666.00
NW Natural	\$	16,666.00	\$	8,000.00	\$24,666.00
Idaho Power Company	\$	16,668.00	\$	3,000.00	\$19,668.00
Portland General Electric	\$	16,666.00	\$	8,000.00	\$24,666.00
PacifiCorp	\$	16,666.00	\$	8,000.00	\$24,666.00

<sup>\*</sup>Due to outstanding requests in other Avista dockets, CUB is not seeking additional funds from Avista in UM 1633.

# **UM 1633 – CERTIFICATE OF SERVICE**

I hereby certify that, on this 20<sup>th</sup> day of February, 2015, I served the foregoing **SECOND AMENDMENT OF PROPOSED BUDGET OF THE CITIZENS' UTILITY BOARD OF OREGON** 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 five copies 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)			
W	EDWARD FINKLEA <b>(C)</b> EXECUTIVE DIRECTIOR		326 FIFTH ST LAKE OSWEGO OR 97034 efinklea@nwigu.org		
W	AVISTA CORPORATION				
	DAVID J MEYER <b>(C)</b> VICE PRESIDENT & CHIEF CO	UNSEL	PO BOX 3727 SPOKANE WA 99220-3727 david.meyer@avistacorp.com		
W	AVISTA UTILITIES				
	ELIZABETH ANDREWS (C)		PO BOX 3727 SPOKANE WA 99220-3727 liz.andrews@avistacorp.com		
	PATRICK EHRBAR (C) MANAGER, RATES & TARIFFS		PO BOX 3727 SPOKANE WA 99220-3727 pat.ehrbar@avistacorp.com		
W	CABLE HUSTON BENEDICT HAAGENSEN & LLOYD				
	TOMMY A BROOKS (C)		1001 SW FIFTH AVE, STE 2000 PORTLAND OR 97204-1136 tbrooks@cablehuston.com		
W	CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP				
	CHAD M STOKES (C)		1001 SW 5TH - STE 2000 PORTLAND OR 97204-1136 cstokes@cablehuston.com		
W	CASCADE NATURAL GAS				
	PAMELA ARCHER (C) SUPERVISOR-REGULATORY AI	NALYSIS	8113 W. GRANDRIDGE BLVD. KENNEWICK WA 99336 pamela.archer@cngc.com		
	MICHAEL PARVINEN <b>(C)</b> DIRECTOR - REGULATORY AFI	FAIRS	8113 W GRANDRIDGE BLVD KENNEWICK WA 99336-7166		

UM 1633 - Certificate of Service SECOND AMENDMENT OF PROPOSED BUDGET OF THE CITIZENS' UTILITY BOARD OF OREGON

michael.parvinen@cngc.com

MARYALICE ROSALES **(C)** REGUALTORY ANALYST I 8113 W GRANDRIDGE BLVD KENNEWICK WA 99336 maryalice.rosales@cngc.com

W DAVISON VAN CLEVE PC

S BRADLEY VAN CLEVE **(C)** 333 SW TAYLOR - STE 400

PORTLAND OR 97204 bvc@dvclaw.com

W DAVISON VAN CLEVE, PC

TYLER C PEPPLE **(C)** 333 SW TAYLOR SUITE 400

PORTLAND OR 97204 tcp@dvclaw.com

W IDAHO POWER COMPANY

REGULATORY DOCKETS PO BOX 70

BOISE ID 83707-0070 dockets@idahopower.com

LISA D NORDSTROM **(C)** PO BOX 70

BOISE ID 83707-0070

Inordstrom@idahopower.com

W LARKIN & ASSOCIATES PLLC

RALPH SMITH **(C)** 15728 FARMINGTON RD

LIVONIA MI 48154 rsmithla@aol.com

W MCDOWELL RACKNER & GIBSON PC

LISA F RACKNER **(C)** 419 SW 11TH AVE., SUITE 400

PORTLAND OR 97205 dockets@mcd-law.com

W NORTHWEST NATURAL

E-FILING 220 NW 2ND AVE

PORTLAND OR 97209 efiling@nwnatural.com

MARK R THOMPSON (C) 220 NW 2ND AVE

PORTLAND OR 97209

mark.thompson@nwnatural.com

W PACIFIC POWER

R. BRYCE DALLEY **(C)** 825 NE MULTNOMAH ST., STE

2000

PORTLAND OR 97232

bryce.dalley@pacificorp.com

SARAH WALLACE **(C)** 825 NE MULTNOMAH ST STE

1800

PORTLAND OR 97232

sarah.wallace@pacificorp.com

W PACIFICORP, DBA PACIFIC POWER

OREGON DOCKETS 825 NE MULTNOMAH ST, STE

2000

PORTLAND OR 97232

oregondockets@pacificorp.com

W PORTLAND GENERAL ELECTRIC

DOUGLAS C TINGEY **(C)** 121 SW SALMON 1WTC1301

PORTLAND OR 97204 doug.tingey@pgn.com

JAY TINKER **(C)** 121 SW SALMON ST 1WTC-

0702

PORTLAND OR 97204 pge.opuc.filings@pgn.com

W PUBLIC UTILITY COMMISSION OF OREGON

BRIAN BAHR (C) PO BOX 1088

SALEM OR 97308-1088 brian.bahr@state.or.us

W PUC STAFF--DEPARTMENT OF JUSTICE

JASON W JONES (C) BUSINESS ACTIVITIES

SECTION

1162 COURT ST NE SALEM OR 97301-4096 jason.w.jones@state.or.us

Respectfully submitted,

Sommer Templet, OSB #105260

Smmufengut

Staff Attorney

Citizens' Utility Board of Oregon 610 SW Broadway, Ste. 400

Portland, OR 97205 (503) 227-1984 phone (503) 224-2596 fax

sommer@oregoncub.org