#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

#### **UM 1633**

In the Matter of	)	AMENDMENT OF PROPOSED BUDGET OF THE CITIZENS'
PUBLIC UTILITY COMMISSION OF OREGON	)	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")¹ and Article 6.6 of the Idaho Power Intervenor Funding Agreement ("Idaho Power IFA"),² the Citizens' Utility Board submits this Amendment of Proposed Budget in docket UM 1633 from 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. 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. CUB's request included a statement that it may seek to amend its budget in this case at a future time.

CUB is now proposing to amend its budget in docket UM 1633, showing total eligible expenses of \$125,000, and seeking a total issue fund grant of \$100,000 to be allocated among the six participating utilities in this docket. Because substantial time has already been spent on this docket in 2014, and because the remaining activity in this docket is scheduled to take place in 2014, CUB identifies the 2014 issue funds of each utility as the funds from which it proposes to allocate the additional grants for each utility. CUB proposes to allocate the additional funds as follows: \$8,334 from the 2014 Avista Issue Fund; \$8,333 from the 2014 CNGC Issue Fund; \$8,333 from the 2014 NW

<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).

Natural Issue Fund; \$8,333 from the 2014 PGE Issue Fund; \$8,334 from the 2014 Idaho Power Issue Fund; and \$8,333 from the 2014 PacifiCorp Issue Fund.

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>3</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, its schedule has changed to include additional workshops and briefing that were not anticipated at the beginning of this case. CUB must still review rebuttal testimony, draft cross-answering testimony, 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 \$100,000. CUB's amended budget accompanies this document as Attachment A.

Respectfully submitted, February 6, 2014

Bob Jenks

Executive Director

Citizens' Utility Board of Oregon

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Enclosures: Attachment A

<sup>3</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	140	\$35,000
Catriona McCracken, General Counsel	\$250	120	\$30,000
Jaime McGovern, Sr. Utility Analyst	\$225	180	\$40,500
SA Anders, Business and Projects Mgr	\$75	2	\$150
Law Clerk	\$75	15	\$1,125
Nadine Hanhan, Utility Analyst	\$125	25	\$3,125
Sommer Templet, Staff Attorney	\$175	85	\$14,875
Other Expenses			
Printing & Mailing			\$75
Travel			\$150
In-House Resources			
20% of Eligible Expenses			(\$25,000)
Total			
			\$100,000
Per-Utility Request:			
Avista Utilities			\$16,668.00
Cascade Natural Gas Company			\$16,666.00
NW Natural			\$16,666.00
Idaho Power Company			\$16,668.00
Portland General Electric			\$16,666.00
PacifiCorp			\$16,666.00

#### **UM 1633 – CERTIFICATE OF SERVICE**

I hereby certify that, on this 6<sup>th</sup> day of February, 2014, I served the foregoing **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)

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