

**BEFORE THE PUBLIC UTILITY COMMISSION**  
**OF OREGON**  
**UM 1689**

In the Matter of	)	
	)	CUB REQUEST FOR AN
PACIFICORP, dba PACIFIC POWER	)	ISSUE FUND GRANT & PROPOSED
	)	BUDGET
	)	
Application for Deferred Accounting and	)	
Prudence Determination Associated with the	)	
Energy Imbalance Market	)	
_____	)	

The Citizens' Utility Board of Oregon (“CUB”) requests a grant of \$9,860 from the PacifiCorp Issue Fund. 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 precertified per OAR 860-001-0120(3)(a) and Article 5.2(a) of the Second Amended and Restated Intervenor Funding Agreement (“IFA”).<sup>1</sup> UM 1689 is an eligible proceeding under the Article 1(c) of the IFA. The proceeding directly affects PacifiCorp, which is a participating public utility under the IFA Article 1(k). CUB filed its Notice of Intent to Request an Issue Fund Grant concurrent with its Notice of Intervention, as required by the Article 6.2 of the IFA.

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

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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) and was subsequently supplemented by Exhibits A, B and C by Order No. 13-317 (Sept. 3, 2013).

*(a) Statement of Work to Be Performed:* CUB intends to participate in every procedural aspect of this case. CUB participated in the pre-hearing conference and the first Commission workshop. We will attend, either in person or by phone, and participate in all or most workshops, settlement meetings, hearings, and any Commission presentations. We will review and analyze PacifiCorp's testimony and briefs. We will review and analyze testimony and briefs filed by other parties. We will pursue discovery of PacifiCorp through data requests, and will respond to data requests asked of us. We will file reply testimony, as well as opening and closing briefs.

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

- A. Examining the costs that PacifiCorp has identified that related to the EIM;
- B. Determining the level of benefits that customers will receive and how to quantify those benefits;
- C. Determining whether these costs and benefits are appropriate for deferred accounting;
- D. Determining the appropriate structure, if one exists, for a deferral related to these costs;
- E. Discuss CUB's preferred mechanism for handling both the costs and benefits of EIM on a going-forward basis; and
- F. 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 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 an issue fund grant of \$9,860 from the PacifiCorp Issue Fund. As of April 30, 2014, the PacifiCorp Issue Fund had an uncommitted balance of approximately \$131,283.99.

*(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 6<sup>th</sup> day of June, 2014  
Respectfully submitted,



Executive Director  
Citizens' Utility Board of Oregon

**CUB Proposed Budget -- UM 1689**

<b>CUB Internal Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
<i>Staff</i>			
Bob Jenks, Executive Director	\$250	15.00	\$3,750.00
Catriona McCracken, General Counsel	\$250	25.00	\$6,250.00
Jaime McGovern, Sr. Utility Analyst	\$225	5.00	\$1,125.00
Sommer Templet, Staff Attorney	\$175	5.00	\$875.00
Nadine Hanhan, Utility Analyst	\$125	2.00	\$250.00
 <i>Other Expenses</i>			
Printing, Mailing & Travel			\$75.00
<hr/>			
<b>In-House Resources</b>			
20% of Eligible Expenses			(\$2,465)
<b>Total</b>			<b>\$9,860</b>

## UM 1689 – CERTIFICATE OF SERVICE

I hereby certify that, on this 6<sup>th</sup> day of June, 2014, I served the foregoing **CUB REQUEST FOR AN ISSUE FUND GRANT & PROPOSED BUDGET** in docket UM 1689 upon each party listed in the UM 1689 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)**

**W DAVISON VAN CLEVE PC**  
**C S BRADLEY VAN CLEVE**  
333 SW TAYLOR - STE 400  
PORTLAND OR 97204  
[bvc@dvclaw.com](mailto:bvc@dvclaw.com)

**W DAVISON VAN CLEVE PC**  
**C TYLER C PEPPE**  
333 SW TAYLOR SUITE 400  
PORTLAND OR 97204  
[tcp@dvclaw.com](mailto:tcp@dvclaw.com)

**W MCDOWELL RACKNER &**  
**C GIBSON PC**  
KATHERINE A MCDOWELL  
419 SW 11TH AVE., SUITE 400  
PORTLAND OR 97205  
[katherine@mcd-law.com](mailto:katherine@mcd-law.com)

**W MOUNTAIN WEST ANALYTICS**  
**C BRADLEY MULLINS**  
333 SW TAYLOR STE 400  
PORTLAND OR 97204  
[brmullins@mwanalytics.com](mailto:brmullins@mwanalytics.com)

**W PACIFIC POWER**  
**C OREGON DOCKETS**  
825 NE MULTNOMAH ST, STE 2000  
PORTLAND OR 97232  
[oregondockets@pacificcorp.com](mailto:oregondockets@pacificcorp.com)

**W PACIFIC POWER**  
**C SARAH WALLACE**  
825 NE MULTNOMAH ST STE 1800  
PORTLAND OR 97232  
[sarah.wallace@pacificcorp.com](mailto:sarah.wallace@pacificcorp.com)

**W PORTLAND GENERAL ELECTRIC**  
**C DONALD LIGHT**  
121 SW SALMON ST - 1WTC1711  
PORTLAND OR 97204  
[donald.light@pgn.com](mailto:donald.light@pgn.com)

**W PORTLAND GENERAL ELECTRIC**  
**C JAY TINKER**  
121 SW SALMON ST 1WTC-0702  
PORTLAND OR 97204  
[pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

**W PUC STAFF**  
**C DEBORAH GARCIA**  
PO BOX 1088  
SALEM OR 97308-1088  
[deborah.garcia@state.or.us](mailto:deborah.garcia@state.or.us)

**W PUC STAFF**  
**C JOHN CRIDER**  
PO BOX 1088  
SALEM OR 97308-1088  
[john.crider@state.or.us](mailto:john.crider@state.or.us)

**W PUC STAFF—DOJ**  
**C MICHAEL T WEIRICH**  
1162 COURT ST NE  
SALEM OR 97301-4096  
[michael.weirich@state.or.us](mailto:michael.weirich@state.or.us)

Respectfully submitted,



Sommer Templet, OSB #105260  
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](mailto:sommer@oregoncub.org)