

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1719

In the Matter of)
)
PUBLIC UTILITY COMMISSION OF)
OREGON) CUB REQUEST FOR AN ISSUE FUND
) GRANT & PROPOSED BUDGET
Investigation to Explore Issues Related to a)
Renewable Generator's Contribution to Capacity)
_____)

The Citizens' Utility Board of Oregon (“CUB”) requests a total grant of \$10,000, split among Portland General Electric’s (“PGE”), PacifiCorp’s, and Idaho Power’s respective 2016 Issue Funds. CUB estimates eligible expenses of \$12,500, before the 20% match. CUB requests \$4,000 from the 2016 Portland General Electric (“PGE”) Issue Fund, \$4,000 from the 2016 PacifiCorp Issue Fund, and \$2,000 from the 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). UM 1719 is an eligible proceeding under the Third Amended and Restated Intervenor Funding Agreement (“IFA”), as approved by the Oregon Public Utility Commission in Order No. 15-335, entered October 20, 2015, and under the Idaho Power-CUB Intervenor Funding Agreement (“Idaho Power IFA”), as approved by the Commission in Order No. 16-028, entered January 26, 2016. The proceeding directly affects PGE, PacifiCorp, and Idaho Power, which are all participating public utilities under their respective 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, as required by the intervenor funding agreements *See* IFA, Article 6.2; Idaho Power IFA, Article 6.2

CUB requests a waiver of IFA Article 6.3 and Idaho Power Article 6.3, which set the deadline for submitting proposed budgets at 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 UM 1719 was October 9, 2015. CUB does not believe that any party is harmed by its delayed request for an issue fund grant in this case.

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. CUB provides the information below.

(a) Statement of Work to Be Performed: CUB intends to participate in every procedural aspect of this case. CUB participated in the prehearing conference, all workshops, and settlement meetings. CUB will also attend and participate in the hearing scheduled for this docket. CUB has reviewed and analyzed the testimony and briefs filed in this docket, and will review the briefs yet to be filed. We have pursued discovery of the PUC through data requests. We have filed testimony and a prehearing brief, and will participate in the hearing and file a post-hearing brief in this docket.

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

- i. The preferred methodology for determining a renewable generator's contribution to capacity.
- ii. The pros and cons of using an Effective Load Carrying Capacity (ELCC) calculation.
- iii. Whether it is appropriate for all utilities to use the same methodology.
- iv. Other issues raised by parties to this proceeding.

(c) Description of the Class or Classes Benefiting from CUB's Participation: CUB represents the interests of PGE, PacifiCorp, and Idaho Power 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 \$4,000 grant from the 2016 PGE Issue Fund, a \$4,000 grant from the 2016 PacifiCorp Issue Fund, and a \$2,000 grant from the 2016 Idaho Power Issue Fund. CUB's budget shows

eligible expenses, before the match, of \$12,500. Section 4.4 of the IFA permits the Commission to “approve an Issue Fund Grant from funds that will be made available in the next calendar year when the proceeding for which the Issue Fund are inadequate to provide the level of Issue Fund Grants that the Commission determines is appropriate.” Although some work and settlement conferences for UM 1719 took place in 2015, significant activity is expected to take place in 2016. CUB respectfully requests that the Commission approve CUB’s request for a \$4,000 grant from the 2016 PGE Issue Fund, a \$4,000 grant from the 2016 PacifiCorp Issue Fund, and a \$2,000 grant from the 2016 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 25th day of February, 2016

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bob Jenks", with a long horizontal flourish extending to the right.

Bob Jenks
Executive Director
Citizens' Utility Board of Oregon

CUB Proposed Budget -- UM 1719

CUB Internal Expenses	Rate	Hours	Cost
<i>Staff</i>			
Bob Jenks, Executive Director	\$250	20.00	\$5,000.00
Staff Attorney	\$175	24.00	\$4,200.00
Nadine Hanhan, Utility Analyst	\$125	25.00	\$3,125.00
 <i>Other Expenses</i>			
Printing & Mailing			\$50.00
Travel			\$125.00
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In-House Resources			
20% of Eligible Expenses			(\$2,500)
Total			\$10,000
CUB Request			\$10,000.00
PGE Request			\$4,000.00
PacifiCorp Request			\$4,000.00
Idaho Power Request			\$2,000.00