BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1909

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In the Matter of
PUBLIC UTILITY COMMISSION OF OREGON,
Investigation of the Scope of the Commission's Authority to Defer Capital Costs.

CUB REQUEST FOR ISSUE FUND GRANTS & PROPOSED BUDGET

The Oregon Citizens' Utility Board ("CUB") requests a total grant of \$12,000, split evenly between the Avista, Cascade, Idaho Power, Northwest Natural, Portland General Electric, and PacifiCorp's respective 2018 Issue Funds. CUB estimates eligible expenses of \$15,000, before the 20% match. CUB requests: \$2,000 from the 2018 Avista Issue Fund, \$2,000 from the 2018 Cascade Issue Fund, \$2,000 from the 2018 Idaho Power Issue Fund, \$2,000 from the 2018 Northwest Natural Fund, \$2,000 from the 2018 PacifiCorp Issue Fund, and \$2,000 from the 2018 Portland General Electric ("PGE") Issue Fund, for a total of \$12,000. 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 1909 is an eligible proceeding under the Fourth Amended and Restated Intervenor Funding Agreement ("IFA"), as approved by the Oregon Public Utility Commission in Order No. 18-017, entered January 217, 2018, and under the Idaho Power-CUB 2016 -2020 Intervenor Funding Agreement ("Idaho Power IFA"), as approved by the Commission in Order No. 16-028, entered January 26, 2016. The proceeding directly affects Avista, Cascade, Idaho Power, Northwest Natural, PacifiCorp, and PGE, which are all participating public utilities under their respective intervenor funding agreements. *See* IFA, Article 1(n); Idaho Power IFA, Article 1(h). CUB filed its Notice of Intent to Request an Issue Fund Grant on March 22, 2018, 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. CUB provides the information below.

- (a) Statement of Work to Be Performed: CUB intends to participate in every procedural aspect of this case. CUB will review and analyze briefs filed in this docket, when they are filed.
- (b) Description of Areas to Be Investigated: CUB is investigating issues including, but not limited to:
 - i. Whether deferring capital investments is allowed/disallowed under Oregon's deferral statue;
 - ii. Whether deferring capital investments should be allowed/disallowed as a matter of policy.
- (c) Description of the Class or Classes Benefiting from CUB's Participation: CUB represents the interests of Avista, Cascade, Northwest Natural, Idaho Power, PacifiCorp, and PGE 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 \$2,000 grant from the 2018 Avista Issue Fund, a \$2,000 grant from the 2018 Cascade Issue Fund, a \$2,000 grant from the 2018 Idaho Power Issue Fund, a \$2,000 grant from the 2018 Northwest Natural Issue Fund, a \$2,000 grant from the 2018 PacifiCorp Issue Fund, and a \$2,000 grant from the 2018 PGE Issue Fund. CUB's budget shows eligible expenses, before the match, of \$15,000. 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." CUB respectfully requests the Commission to approve CUB's request for: a \$2,000 grant from the 2018 Avista Issue Fund, a \$2,000 grant from the 2018 Cascade Issue Fund, a \$2,000 grant from the 2018 Idaho Power Issue

Fund, a \$2,000 grant from the 2018 Northwest Natural Issue Fund, a \$2,000 grant from the 2018 PacifiCorp Issue Fund, and a \$2,000 grant from the 2018 PGE 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 26th day of March, 2018.

Respectfully submitted,

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Bob Jenks Executive Director Oregon Citizens' Utility Board

CUB Proposed Budget -- UM 1909

CUB Internal Expenses	Rate	Hours	Cost
Staff			
Bob Jenks, Executive Director	\$250	15.00	\$3,750.00
Michael Goetz, Staff Attorney	\$225	22.00	\$4,950.00
Will Gehrke, Economist	\$200	26.00	\$5,200.00
Sarah Ryan-Knox, Paralegal	\$100	10.00	\$1,000.00
Other Expenses			
Printing, Mailing & Travel			\$100.00
In-House Resources20% of Eligible Expenses			(\$3,000)
Amount requested per utility:			
Avista		\$	2,000.00
Cascade		\$	2,000.00
Idaho Power		\$	2,000.00
Northwest Natural		\$	2,000.00
PGE		\$	2,000.00
PacifiCorp		\$	2,000.00
Total in Issue Fund Grants		\$	12,000.00