

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 301**

In the Matter of	)	
	)	CUB REQUEST FOR AN ISSUE
IDAHO POWER COMPANY's	)	FUND GRANT & PROPOSED
	)	BUDGET
2016 Annual Power Cost Update (APCU)	)	
<hr/>	)	

The Citizens' Utility Board of Oregon (“CUB”) estimates eligible expenses of \$18,750, before the 20% match, and requests a grant of \$15,000 from the 2016 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). UE 301 is an eligible proceeding under the 2016-2020 Intervenor Funding Agreement (“IFA”) between Idaho Power Company and the Citizens’ Utility Board of Oregon, as approved by the Oregon Public Utility Commission in Order No. 16-028, entered January 26, 2016. The proceeding directly affects Idaho Power, which is a participating public utility under the IFA. *See* IFA at Article 1(h). CUB filed its Notice of Intent to Request an Issue Fund Grant on October 27, 2015.

CUB also requests a waiver of IFA Article 6.3, which sets 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 UE 301 was December 20, 2015. CUB

does not believe that any party is harmed by its delayed request for an issue fund grant in this case.

Pursuant to paragraph 6.3 of the 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 Idaho Power 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. Idaho Power's cost of coal supply and shipment.
- ii. Hydro conditions and their effect on power costs.
- iii. Purchase power and sales for resale.
- iv. Rate spread.
- v. 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 Idaho Power'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 a \$15,000 grant from the 2016 Idaho Power Issue Fund. CUB's budget shows eligible expenses of \$18,750, but CUB limits its request in this case to \$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." Although some work and settlement conferences for UE 301 took place in 2015, significant activity is expected to take place in 2016. Given the limited funds available in Idaho Power's 2016 Issue Fund, CUB respectfully requests that the Commission approve CUB's request for a \$15,000 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 22nd 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 301

<b>CUB Internal Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
<i>Staff</i>			
Bob Jenks, Executive Director	\$250	24.00	\$6,000.00
Jaime McGovern, Senior Economist	\$225	31.00	\$6,975.00
Staff Attorney	\$175	24.00	\$4,200.00
Paralegal	\$75	19.00	\$1,425.00
<i>Other Expenses</i>			
Printing, Mailing & Travel			\$150.00
Outside Expert Witness			
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<b>In-House Resources</b>			
20% of Eligible Expenses			(\$3,750)
<b>Total</b>			<b>\$15,000</b>