Cleantech Law Partners

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March 22, 2016

Via Electronic Filing

Public Utilities Commission of Oregon
Filing Center
POB 2148
Salem, OR 97308
puc.filingcenter@state.or.us

Re: PACIFICORP, dba PACIFIC POWER

2017-2021 Renewable Portfolio Standard Implementation Plan

Docket No. UM 1754

Dear Filing Center:

Please fine enclosed for filing in the above-referenced docket Proposed Budget of Small Business Utility Advocates for an Issue Fund Grant.

Please contact me at dhenkels@cleantechlaw.com or 541-270-6001 if you have any questions. Thank you for your assistance in this matter.

Sincerely,

Diane Henkels,
Cleantech Law Partners, PC
Counsel for SBUA
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Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1754

In the Matter of PACIFICORP, dba PACIFIC POWER 2017-2021 Renewable Portfolio Standard Implementation Plan	))))))))	PROPOSED BUDGET OF SMALL BUSINESS UTILITY ADVOCATES FOR ISSUE FUND GRANT

Pursuant to Section 6.3 of the Third Amended and Restated Intervenor Funding Agreement ("IFA") approved by the Oregon Public Utility Commission ("Commission") in Order 15-335, and Order 16-113 granting SBUA case-certification in this docket, SBUA respectfully submits this Proposed Budget for Issue Fund Grant ("Proposed Budget") seeking an Issue Fund Grant in the amount of $2,236.

As stated in its Notice of Intent to Request an Issue Fund Grant, SBUA identifies PacifiCorp as the Participating Public Utility account, and SBUA proposes that such grant be funded from the PacifiCorp Issue Fund Account.

The following information is provided in accordance with Section 6.3 of the IFA:

1. Statement of the work performed by SBUA for which SBUA is seeking the Issue Fund Grant:

SBUA has retained Cleantech Law Partners PC to represent SBUA in UM 1754. PacifiCorp filed its 2017-2021 Renewable Portfolio Standard ("RPS") Implementation Plan on December 29, 2015. SBUA has accessed or received, and read through all related documents filed in the docket, researched additional relevant information as reasonably possible, and prepared and filed written comments. SBUA retained an expert policy witness to review the Renewable Portfolio Standard matter and assist in formulating these comments. SBUA would attend any public meeting or other gathering in UM 1754 though has not factored that in to this budget.

2. Description of areas to be investigated by SBUA:

SBUA has investigated Oregon PacifiCorp customer numbers and load, PacifiCorp's plan to meet its RPS requirements in the years 2017- 2021 including in-state and out-of-state projects, potential impact of SB 1574, and the utility's 2015 Integrated Resource Plan currently before the Commission. SBUA has also investigated relevant small business customer context in the recent rate case.

3. Description of the particular customer class that benefit from the intervenor's participation.

SBUA's participation will directly benefit small commercial customers who are served by PacifiCorp, including Schedule 23 and 28 customers as well as other PacifiCorp customers.

4. Identification of the specific Fund account from which SBUA is seeking the Issue Fund Grant and an estimate of available funds in that account:

SBUA is seeking an Issue Fund Grant in the amount of $2,236 from the PacifiCorp Issue Fund Account, established under IFA Section 4.2.3. PacifiCorp has as of March 22, 2016 $45,787.23 funds remaining in its issue fund account.

5. Budget showing estimated attorney, consultant fees, and expert witness fees:

Attached as Exhibit A is SBUA's Proposed Budget to comply with IFA 6.3(e), (f), and (g). The Proposed Budget details the hours and hourly rates of SBUA's attorneys and expert. The Proposed Budget was developed based on work performed in previous dockets pertaining to reading and commenting on filings. SBUA's budget assumes that the case will end with a public meeting within 120 days of the implementation plan filing date. Having reviewed and commented, SBUA anticipate this proposed budget to be accurate, however, if the scope of the case is expanded, SBUA would petition to submit a revised budget.

6. Representation regarding matching funds:

As required by Section 6.5(g) of the IFA, SBUA represents that it has used and will use matching funds in the form of either in-house resources or outside funding to account for or pay at least 20% of the Eligible Expenses for which SBUA is seeking an Issue Fund Grant.

Basis for Request

SBUA respectfully requests that the Commission grant its request for this Issue Fund Grant in the amount of $2,236, based on the following considerations:

1. The incremental costs of compliance with renewable standards could rise significantly, notwithstanding the cap incorporated into the original and recent Oregon renewable portfolio legislation. All incremental costs are included in the PacifiCorp's rates paid by the SBUA members who are PacifiCorp customers. Small nonresidential ratepayers appear to have been subject to the largest proportional rate increase in the most recent PacifiCorp General Rate Case. Particularly considering recent passage of SB 1574, small commercial is potentially greatly impacted by how PacifiCorp sources its power satisfying RPS requirements. Even without SB 1574, small business is impacted by rates, and also by economic opportunity presented or drained from the state, by how the utility complies with the renewable portfolio standard.

2. SBUA has reviewed PacifiCorp's Implementation Plan ("Implementation Plan") filing for compliance with relevant statutory and Commission role requirements, other information pertinent to the Implementation Plan, and related documents, and filed comments on behalf of small business, nonresidential ratepayers.

3. SBUA represents the interests of small business customers and has experience participating in Commission proceedings involving PacifiCorp. SBUA's participation will benefit PacifiCorp small business customers, as well as other customers of PacifiCorp.

4. Pursuant to IFA 5.3 and Commission Order 16-113, SBUA's Petition for Case Certification was granted. SBUA has submitted a Notice of Intent to Request an Issue Fund Grant, and SBUA became eligible to submit this Proposed Budget for consideration.

5. SBUA did contact and confer with PacifiCorp's counsel regarding intervention and seeking intervenor funding prior to SBUA's intervention, and SBUA did also contact other intervenors regarding same.

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Therefore, SBUA respectfully requests that the Commission issue an order granting an Issue Fund Grant in the amount of $2,236. SBUA prepared the attached budget on the basis of costs incurred in previous cases and stands ready to supply more information upon request.

RESPECTFULLY SUBMITTED March 22, 2016.

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Cleantech Law Partners PC
Counsel for Small Business Utility Advocates

UM 1754

Exhibit A

Small Business Utility Advocates
Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
Executive Director	2	$250	$500
Sr. Attorney	6	$275	$1650
Jr. Attorney	2	$225	$450
Administrative support	2	$30	$60
Expert Witness fees	1	$135	$135
Costs:	0		$0
Subtotal:	13		$2795
20% SBUA:			$559
Total SBUA Issue Fund Request:			$2236

CERTIFICATE OF FILING SERVICE

I hereby certify that on March 22, 2016, I served on the following a copy of PROPOSED ISSUE FUND BUDGET OF SMALL BUSINESS UTILITY ADVOCATES in UM 1754 PacifiCorp's 2017-2021 Renewable Portfolio Standard Implementation Plan by electronic mail unless otherwise noted.

Citizens' Utility Board Of Oregon	610 SW Broadway, Ste 400 Portland Or 97205 Dockets@Oregoncub.Org
Pacificorp, dba Pacific Power	825 NE Multnomah St, Ste 2000 Portland Or 97232 Oregondockets@Pacificorp.Com
Michael Breish **(C)** Public Utility Commission Of Oregon	PO Box 1088 Salem Or 97308-1088 Michael.Breish@State.Or.Us
Jesse E Cowell (C) Tyler C Pepple (C) Davison Van Cleve	333 SW Taylor St., Suite 400 Portland Or 97204 Jec@Dvclaw.Com, Tcp@Dvclaw.Com
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Dated: March 22, 2016

Diane Henkels,
Cleantech Law Partners PC
Counsel for Small Business Utility Advocates