

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UE 352**

In the Matter of )  
 )  
PACIFICORP, dba PACIFIC POWER, ) CUB REQUEST  
 ) FOR AN ISSUE FUND GRANT &  
 ) PROPOSED BUDGET  
2019 RENEWABLE ADJUSTMENT CLAUSE )  
 )  
\_\_\_\_\_ )

The Oregon Citizens' Utility Board (“CUB”) estimates eligible expenses of \$50,000 before the 20% match and requests a grant of \$40,000 from the 2019 PacifiCorp (“PacifiCorp”) Issue Fund. CUB has been tracking its participation in this docket by hours and activity.

CUB is pre-certified per OAR 860-012-0100(3)(a). UE 352 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. 19-024, entered January 23, 2019. The proceeding directly affects PacifiCorp, which is a participating public utility under the IFA. *See* IFA at Article 1(n). The Fourth Amended Intervenor Funding Agreement approved by the Commission in Order No. 18-017, defines “Eligible Proceedings for Issue Funds” as a proceeding before the Commission to review: 1. A general rate case request, 2. The proposed acquisition or merger of one of the Participating Public Utilities, 3. An Integrated Resource Plan, 4. An annual power cost request (such as PGE’s Annual Update Tariff or PacifiCorp’s TAM) or a purchase gas adjustment request, or 5. Any other proceeding so designated by the Commission that directly affects one or more of the Participating Utilities and is anticipated to have a substantial impact on utility rates or service, a significant impact on utility customers or the operations of the utility, is likely to result in a significant change in regulatory policy, or raises novel questions of law. UE 352 is PacifiCorp’s Renewable Adjustment Clause which constitutes a substantial impact on utility rates; thus, an Issue Fund Grant may be made for this proceeding under Article 6.1 of the IFA. CUB filed its Notice of Intent to Request an Issue Fund Grant, as required by the IFA (Article 6.2), on February 1, 2019.

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. We will attend and participate in all or most workshops, Commission presentations and public meetings. We will review and analyze PacifiCorp's and other parties' comments. We may pursue discovery of PacifiCorp through data requests, and we will respond to data requests asked of us. We will file opening and final comments, and present our recommendations to the Commission, including any proposed modifications or conditions.

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

- i. The prudence of wind re-powering projects;
- ii. The benefits of the wind re-powering projects;
- iii. The functionalization of wind re-powering projects;

(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 a \$40,000 grant from the 2019 PacifiCorp Issue Fund. CUB's budget shows eligible expenses of \$50,000, but CUB limits its request in this case to \$40,000. Given the current amount of \$163,567 available in PacifiCorp's 2019 Issue Fund, CUB respectfully requests that the Commission approve CUB's request for a \$40,000 grant from the 2019 PacifiCorp 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 4<sup>th</sup> day of February, 2019.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bob Jenks". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bob Jenks, Executive Director  
Oregon Citizens' Utility Board

## CUB Amended Budget -- UE 352

<b>CUB Internal Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
<i>Staff</i>			
Bob Jenks, Executive Director	\$250	37.00	\$9,250.00
Michael Goetz, Staff Attorney	\$225	150.00	\$33,750.00
Sudeshna Pal, Economist	\$175	35.00	\$6,125.00
Essie Bender, Office Manager/Paralegal	\$100	7.75	\$775.00
<i>Other Expenses</i>			
Printing, Mailing & Travel			\$100.00
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<b>In-House Resources</b>			
20% of Eligible Expenses			(\$10,000)
<b>Total</b>			<b>\$40,000</b>