

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 74**

In the Matter of	)	
	)	CUB REQUEST FOR AN ISSUE
IDAHO POWER COMPANY,	)	FUND GRANT & PROPOSED
	)	BUDGET
2019 INTEGRATED RESOURCE PLAN.	)	
_____	)	

The Oregon Citizens' Utility Board (“CUB”) estimates eligible expenses of \$18,749.50 before the 20% match and requests a grant of \$15,000 from the 2019 Idaho Power 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). LC 74 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 17, 2018. The proceeding directly affects Idaho Power, which is a participating public utility under the IFA. *See* IFA at Article 1(n). The IFA defines an Eligible Proceeding for Issue Funds as “iii. an Integrated Resource Plan.” IFA, Article 1(c). LC 74 is Idaho Power’s Integrated Resource Plan; thus, an Issue Fund Grant may be made for this proceeding under Article 6.1 of the IFA.

Article 6.2 of the IFA requires an intervenor seeking an Issue Fund Grant to file a Notice of Intent to Request and Issue Fund Grant. CUB filed its Notice of Intent to Request an Issue Fund Grant concurrent on July 26, 2019, as required by the IFA (Article 6.2).

Article 6.3 of the IFA requires an intervenor seeking and Issue Fund Grant to file a proposed budget within 30 days after the prehearing conference at which the schedule for the proceeding is established. The prehearing conference in this docket was held on February 20,

2020.

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 and will participate in all workshops. CUB will review and analyze the comments filed by various parties in this proceeding. We have pursued discovery of Idaho Power through data requests and we will respond to data requests asked of us. We will file comments and participate in any Commission workshops in this proceeding.

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

- i. Analysis of solar resource additions.
- ii. Analysis of proposed thermal unit closures.
- iii. Long-Term Load Forecasting.
- iv. Analysis demand response additions.

*(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 2019 Idaho Power Issue Fund. CUB's budget shows eligible expenses of \$18,749.50, but CUB limits its request in this case to \$15,000. Given the current amount of \$56,000 available in Idaho Power's 2019 Issue Fund, CUB respectfully requests that the Commission approve CUB's request for a \$15,000 grant from the 2019 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 2<sup>nd</sup> day of April 2020.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bob Jenks", with a stylized flourish at the end.

Bob Jenks  
Executive Director  
Oregon Citizens' Utility Board of Oregon

## Attachment A

### CUB Proposed Budget -- LC 74

<b>CUB Internal Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
<i>Staff</i>			
Bob Jenks, Executive Director	\$275	13.00	\$3,575.00
Michael Goetz, General Counsel	\$250	13.00	\$3,250.00
Essie Bender, Office Manager	\$100	2.50	\$250.00
Will Gehrke, Economist	\$225	20.00	\$4,500.00
Sudeshna Pal, Economist	\$200	33.50	\$6,700.00
Jack Watson, Legal Intern	\$130	3.65	\$474.50
<i>Other Expenses</i>			
Travel			
<b>SubTotal</b>			\$18,749.50
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<b>In-House Resources</b>			
20% of Eligible Expenses			\$3,750
<b>Total</b>			<b>\$15,000</b>