

**BEFORE THE PUBLIC UTILITY COMMISSION**

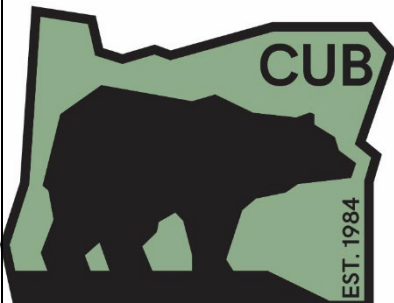
**OF OREGON**

**UM 1929 & UM 2126**

In the Matter of )  
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PUBLIC UTILITY COMMISSION OF )  
OREGON, )  
 )  
The Fourth Amended and Restated )  
Intervenor Funding Agreement )  
 )  
and )  
 )  
In the Matter of the Intervenor Funding )  
Agreement by and among )  
 )  
IDAHO POWER COMPANY and the )  
CITIZENS' UTILITY BOARD. )  
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**INTERVENORS' REPORT  
OF THE  
CITIZENS' UTILITY BOARD**

March 31, 2023



**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1929 & UM 2126**

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This Intervenor’s Report is intended to comply with Section 6.8 of the Fourth Amended and Restated Intervenor Funding Agreement (“IFA”)<sup>1</sup> and Section 6.7 of the Idaho Power Company and Citizens’ Utility Board Intervenor Funding Agreement (“Idaho Power IFA”).<sup>2</sup>

***Summary of 2022 Issue Fund Activity***

Section 6.8(a) of the IFA and Section 6.7(a) of the Idaho Power IFA dictate that each intervenor shall submit a summary of its continuing and newly-approved Issue Fund Grants, as well as pending

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<sup>1</sup> The Fourth Amended and Restated Intervenor Funding Agreement was approved by the Commission in Order No. 18-017 (January 17, 2018).  
<sup>2</sup> The 2021-2025 Idaho Power-CUB Intervenor Funding Agreement was approved by the Commission in Order No. 20-493 (December 29, 2020).

proposed budgets for Issue Fund Grants in the prior year. Attached is a table containing this information:  
CUB Summary of 2022 Issue Fund Activity.

***Expenditures for Intervenor Participation***

Section 6.8(c)(1) of the IFA and Section 6.7(b)(1) of the Idaho Power IFA dictate that, in the Intervenor’s Report, the intervenor shall include a statement showing the total expenditures the intervenor incurred participating in all proceedings affecting the Participating Public Utilities before the Commission. The IFA requires a showing of total expenditures in each of the prior five calendar years;<sup>3</sup> the Idaho Power IFA requires a showing of estimated expenditures for the prior calendar year.<sup>4</sup>

CUB understands the primary purpose of this to be a demonstration of how the members of the intervening organization are financially supporting the regulatory work being done on their behalf. CUB is unusual among intervenors, since most of our regulatory work is done by CUB staff, rather than contracted attorneys and consultants. For CUB, this structure is important, as it reduces costs and increases our in-house expertise. However, this structure means we do not typically have invoices from consultants for most of the dockets, and our cost of participation includes a share of our rent and other overhead. In 2022, CUB hired a consultant to provide analysis for a matter before the PUC. The cost below is based on the cost of the CUB regulatory staff, plus overhead and consultant fees for a PUC matter, and excludes the cost of CUB staff that do not participate before the PUC.

The table below is our best estimate of CUB expenditures associated with participating in PUC cases affecting the participating utilities.

<b>Year</b>	<b>Expenditures</b>
2022	\$643,799
2021	\$498,121
2020	\$473,436
2019	\$554,752

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<sup>3</sup> IFA Article 6.8(c)(1).

<sup>4</sup> Idaho Power Article 6.7(b)(1).

***Expenditures for Which Payment Was Requested***

Section 6.8(c)(2) of the IFA and Section 6.7(b)(2) of the Idaho Power IFA requests a statement showing the amount of expenditures the intervenor incurred while working on proceedings affecting participating public utilities in the prior calendar year. The incurred amounts reflect our participation in proceedings, for which we requested payment of an Issue Fund grant or Preauthorized Matching Fund. CUB provides docket-specific expenditures to the Commission with each request for payment, and the attached table summarizes the authorized and received payments in each docket.

Respectfully Submitted,

March 31, 2023



Executive Director  
Oregon Citizens' Utility Board

Docket	Date of Notice of Intent	Date of Request or Budget Order	Approved Budget	Payment Order	Release Remaining
<b>2020 Holdover Dockets:</b>					
UM 2024	2/4/2020	20-049	\$25,000.00	Partial Payment Order 20-452	No
<b>2021 Dockets</b>					
UE 394	7/14/2021	21-249	\$41,250.00	Partial Payment Order 21-479	
		22-027	\$50,000.00	23-073	Yes
UM 2178	10/18/2021	21-424	\$30,000.00	22-449	Yes
UM 2165	7/26/2021	21-250	\$20,000.00	23-092	Yes
UM 2183	10/20/2021	21-425	\$5,000.00		
<b>2022 Dockets</b>					
UG 433	1/6/2022	22-003	\$50,000.00	23-091	Yes
UG 435	2/2/22	22-026	\$80,000.00		
		23-044	\$113,500.00	23-096	Yes
UE 399	3/18/22	22-182	\$50,000.00	23-094	Yes
UE 400	3/18/22	22-183	\$22,272.00	23-095	Yes
UE 401	3/18/22	22-441	\$5,000.00	22-441	Yes
LC 78	12/22	23-043	\$20,000.00		
LC 76	12/22	23-042	\$6,000.00		
LC 79	12/22	23-041	\$40,000.00		