

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 652

In the Matter of

Rulemaking Regarding Intervenor
Funding (2021 HB 2475)

PARTICIPATING PUBLIC UTILITIES’
WRITTEN COMMENTS

The Participating Public Utilities¹ appreciate this opportunity to file written comments on the draft rules attached to the Notice of Proposed Rulemaking filed with the Oregon Secretary of State on February 23, 2023, for Commission Docket AR 652.

We have attached to these comments at Exhibit 1 a document that shows all the Participating Public Utilities’ proposed changes. Many of the proposed changes are administrative and reflect non-substantive proposed changes. In these written comments we highlight the more substantive of our proposed clarifying changes. We believe that all our proposed changes are clarifying in nature and reflect the intent of the parties to the Environmental Justice Communities Funding Agreement, effective February 8, 2023 (the “Agreement”).

First, consistent with ORS 757.072, we propose changes to the purpose statement (proposed rule -800) to make clear that the scope of the funding available under the rules encompasses representation and advocacy that address low-income residential issues. This is not a substantive change as the rules and Agreement are clear on this topic, but we propose these changes so that it is clear to organizations who are less familiar with the Agreement and the funding made available by the Agreement and these rules.

¹ PacifiCorp, Northwest Natural Gas Company, Portland General Electric Company, Avista Utilities, Cascade Natural Gas Corporation, and Idaho Power Company.

Second, we propose changes to clarify that the rules are describing obligations and processes under the executed Agreement. In other words, the obligations under the rules are dependent on an agreement being in place and should not be understood to impose ongoing obligations absent an agreement. This is the clear structure under ORS 757.072, which authorizes the Commission to administer voluntary agreements between public utilities and qualifying organizations. We propose changes to rules -850(1) and -860(1) on this basis.

Third, we propose adding greater specificity under rule -0850(1). This rule mirrors the language in the Agreement by limiting pre-certified organizations to no more than five per year. We think the intent was that the limitation to five organizations was meant to be applied on a per utility basis and not as to all entities that may seek pre-certification status from the three utilities with pre-certification funds. It would be helpful for the rules to reflect this clarification.

Fourth, we propose providing more detail regarding confidential treatment of certain information provided under rule -890 so that the confidentiality obligations with respect to Participating Public Utilities, the Commission and other stakeholders are clear. The additional detail we propose is set forth in rule -890(9) and is consistent with the Agreement (see section 7.3).

Finally, the draft rules should address potential termination of eligibility and its effect. These provisions are contained in the general CUB/AWEC Intervenor Funding Agreement² and were outlined in Exhibit 2 to the Agreement, sections 4 and 5. Based on our initial review of the proposed rules, we did not see these provisions and urge that they be added to the rules. We propose adding these provisions to rule -840(4) and (5).

² Fifth Amended and Restated Intervenor Funding Agreement by and among Portland General Electric Company, PacifiCorp, Northwest Natural Gas Company, Cascade Natural Gas Corporation, Avista Utilities, Alliance of Western Energy Consumers, and Oregon Citizens' Utility Board, December 8, 2022, Article 8 (attached to Staff Memo, dated December 13, 2022, in UM 2264).

Thank you for the opportunity to provide these written comments.

DATED this 28th day of March 2023.

Respectfully submitted,



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OAR 860-001-0800

Purpose Statement

(1) The purpose of OAR 860-001-0800 through OAR 860-001-0900 is to provide guidance for organizations seeking Justice Funding Grants, made available through ORS 757.072, for organizations to represent the interests of low-income residential customers or the interests of environmental justice communities to participate in matters at the Oregon Public Utility Commission.

(2) These rules facilitate the administration and implementation of ~~reflect~~ the Agreement adopted by the Commission and found online at <https://apps.puc.state.or.us/orders/2023ords/23-033.pdf>.

(3) Under the Agreement, two funds are established for Justice Funding Grants, the Pre-certification Fund and Case Fund. These funds are from the Participating Public Utilities, and the grants under each fund are approved by the Commission.

(4) The Commission may delegate its authority set forth in OAR 860-001-0840, OAR 860-001-0850, OAR 860-001-0860, and OAR 860-001-0890. The delegate's decisions may be appealed to the Commission.

Stat. Authority: ORS 757.072

Stat. Implemented: ORS 757.072

OAR 860-001-0810

Definitions

As used in OAR 860-001-0800 through 860-001-0900:

(1) “Agreement” means the agreement approved in Final Order No. 23-033 and found online at <https://apps.puc.state.or.us/orders/2023ords/23-033.pdf>.

(2) “Case-certified Organization” means an organization the Commission has designated as meeting the requirements of OAR 860-001-0840 and OAR 860-001-0860(6).

(2) “Case Fund” is a Participating Public Utility fund that is available to a Case-certified organization to reimburse or grant to fund activity in a specific Case-certified matter.

(3) “Eligible Expenses” are expenses for which Eligible Recipients may request payment of consistent with OAR 860-001-0870.

(4) “Eligible Proceedings” are proceedings which the Commission has determined meet the requirements of Rule OAR 860-001-0830.

(5) “Eligible Recipient” means an organization that represents the interests of either low-income residential customers, as described in OAR 860-021-0180, or customers that are members of Environmental Justice Communities as defined below.

(6) “Environmental Justice” means equal protection from environmental and health hazards and meaningful public participation in decisions that affect the environment in which people live, work, learn, practice spirituality and play.

(7) “Environmental Justice Community or Communities” includes communities of color, communities experiencing lower incomes, tribal communities, rural communities, coastal communities, communities with limited infrastructure and other communities traditionally underrepresented in public processes and adversely harmed by environmental and health hazards, including but not limited to seniors, youth, and persons with disabilities;

(8) “Justice Funding Grants” are grants from either a Pre-certification Fund or a Case Fund made subject to these rules.

(9) “Participating Public Utility or Utilities” means Northwest Natural Gas Company, dba NW Natural, PacifiCorp, dba Pacific Power, Portland General Electric Company, Cascade Natural Gas Corporation, Avista Corporation, dba Avista Utilities, or Idaho Power Company.

(10) “Pre-certification Fund” is a Participating Public Utility fund that is available to a Pre-certified Organization to reimburse or grant to fund activity in an Eligible Proceeding.

(11) “Pre-certified Organization” means an organization that the Commission has determined meets the eligibility criteria under ORS 757.072(2)(a)(B) and (C) and the rules below.

Stat. Authority: ORS 757.072

Stat. Implemented: ORS 757.072

OAR 860-001-0820

Funding Amounts and Rollover

(1) The amounts to be made available annually for the Pre-certification Fund and the Case Fund for each utility is set forth in the aAgreement approved by the Commission and found online at <https://apps.puc.state.or.us/orders/2023ords/23-033.pdf>.

(2) A balance in any of the Justice Grant Case Funds or Pre-certification Funds accounts that is unused in any year will be carried over at the end of the calendar year and made available for use in succeeding years, except that the amount rolled over to the next year may not exceed the amounts listed in section (1) of this rule.

(3) Up to seventy percent of any balance remaining in any of the Pre-certified Ffunds after the annual grants are approved may be used for Case Fund gGrants for that calendar year after approval by the Commission of a request to reallocate these funds.

Stat. Authority: ORS 757.072

Stat. Implemented: ORS 757.072

OAR 860-001-0830

Eligible Proceedings

(1) Eligible Proceedings include proceedings before the Commission that affect a Participating Public Utility, its customers and its Environmental Justice Communities including, but not limited to, named, non-docketed Commission led processes, rulemakings, contested cases, declaratory ruling proceedings, contested case proceedings such as rate cases, integrated resource plans and updates, distribution system planning, depreciation dockets, deferrals for projects or pilots and design and implementation of differential rates, the Energy Trust’s budget and planning process, and power or purchased gas adjustments; but they do not include complaint proceedings initiated or caused to be initiated by the Grantee.

(2) Justice Funding Grants will not be made available for proceedings involving telecommunications utilities, water utilities, or wastewater utilities unless the proceedings relate to one or more of the Participating Public Utilities.

Stat. Authority: ORS 757.072

Stat. Implemented: ORS 757.072

OAR 860-001-0840

Justice Funding Eligibility

(1) All Organizations meeting the following criteria may be certified by the Commission to be eligible to receive Justice Funding Grants:

(a) The organization represents the interests of low-income residential customers or Environmental Justice Communities, and participation in proceedings will be primarily directed at public utility issues affecting those interests, including but not limited to interests in utility rates and terms and conditions of service, interests in the cost of access and impact from the delivery of services, interest in utility programs, and interest in utility resource planning;

(b) The organization identifies the specific Environmental Justice Community or low-income customers it represents and demonstrates that it is able to effectively represent them;

(c) The organization demonstrates that it is able to effectively represent or develop advocacy positions benefitting or informed by the Environmental Justice Community or low-income customers, in the service area of each Participating Public Utility for which funding is sought and demonstrates how it will identify the issues or advocacy positions that are important to those represented;

(d) When applicable, the organization has demonstrated in past Commission matters its ability to substantively contribute to the record on behalf of such interests; and

(e) In contested case proceedings, the organization demonstrates that its request for funding will not unduly delay the schedule of the proceeding.

(2) In determining whether organizations should be eligible to receive a Justice Funding Grant, the Commission may also consider whether the organization has significant ties to the Environmental Justice Community or low-income customers in the service area of each Participating Public Utility for which the Justice Funding Grant is sought.

(3) Pre-certified and Case-certified grantees are encouraged to make all reasonable efforts to enter into agreements with each other at any time, including before submitting proposed budgets or after receiving Case Fund Grants, to combine their efforts and resources in a case. Such cooperative efforts shall not affect the amount of their grants.

(4) Upon the filing of a complaint pursuant to ORS 756.500 or upon a Commission investigation or motion pursuant to ORS 756.515, the Commission may terminate the pre-certification or case-certification of an eligible entity, grantee or applicant if it finds that:

(a) The organization has committed fraud, misrepresentation, or misappropriation related to a Justice Funding Grant;

(b) In a proceeding before the Commission for which Justice Funding Grants were awarded to the organization, the organization has consistently failed to represent the interests of the Environmental Justice Community that the organization purported to represent in its application for pre-certification;

(c) The organization has failed to comply with Commission orders or rules in material ways;

(d) The organization no longer meets the criteria established in these rules.

(5) In the event of termination of the pre-certification or case-certification of an organization, such termination shall take effect on a prospective basis only. Organizations that have been decertified may not receive Justice Funding Grants. Organizations that have been decertified may recover Eligible Expenses incurred pursuant to a Commission authorized Justice Funding Grant

and incurred before decertification, subject to satisfaction of the requirements for payment of grants set forth in the Agreement and these rules.

Stat. Authority: ORS 757.072

Stat. Implemented: ORS 757.072

OAR 860-001-0850

Pre-certification Fund

~~(1) NW Natural, PacifiCorp, and Portland General Electric have Pre-certification Fund accounts.~~

~~(12) For each of the Pre-Certification Fund accounts established under the Agreement, No~~ more than five eligible organizations will be Pre-certified each year.

~~(23) Pre-certified Organizations may request an a~~Advance from the Pre-certification accounts in the next year.

~~(34) Applications for Pre-certification for the subsequent year must be filed no later than November 10 in docket UM 2276.~~

~~(45) Pre-certification requests must include the following elements:~~

(a) A narrative on why the applicant meets the eligibility criteria set forth in OAR 860-001-0840;

(b) The matters in which the applicant intends to participate, the nature of that participation, and why these matters are Eligible Proceedings;

(c) The Participating Public Utility account or accounts from which the applicant seeks funds; and

(d) A budget showing estimated Eligible Expenses.

~~(56) Any person may provide a response to an application within 14 days of the filing of the application.~~

~~(67) The Commission will make best efforts to review and act upon an application for Pre-certification within 45 days of receipt. The Commission may approve or deny, in whole or in part, the application based on any of the following factors:~~

(a) The breadth and complexity of the issues or the importance of community participation;

(b) The degree to which any policy issues affect the interests of low-income residential customers or the interests of residential customers that are members of Environmental Justice Communities;

(c) The proposed budget; which must include a description of the Participating Public Utility account or accounts from which the applicant seeks funds and how payments should be apportioned.

(d) The eligibility criteria to which the applicant is subject;

(e) The qualifications of the applicant and experience before the Commission; and

(f) The level of available Pre-certified Funds consistent with the ~~a~~Agreement ~~approved by the Commission and found online at <https://apps.puc.state.or.us/orders/2023ords/23-033.pdf>.~~

~~(78) Once Pre-certified, an organization will remain Pre-certified for one year unless the Commission terminates the Pre-certification.~~

~~(89) A Pre-certification Fund Grant recipient may file a request to amend its budget for good cause. The Commission will make best efforts to act upon the request within 21 days of receiving the proposed amendment or, if applicable, any supplemental information provided in response to~~

the Commission's request. Any person may provide a response to a proposed budget amendment within 14 days of the filing of the request.

(919) The Commission may amend an approved Pre-certified grantee's budget if it finds that the approved budget is no longer warranted. If the Commission amends an approved budget, it will provide notice to the Pre-certification Fund Grant recipient and afford an opportunity to comment and provide a revised budget.

Stat. Authority: ORS 757.072

Stat. Implemented: ORS 757.072

OAR 860-001-0860

Case Fund

~~(1) NW Natural, PacifiCorp, Portland General Electric, Idaho Power, Avista, and Cascade Natural Gas have Case Fund accounts.~~

(12) Applicants seeking a Case Fund Grant must file a notice of intent and request for case certification to request a Case Fund Grant when it files its petition to intervene or notice of participation in the matter or, for matters that do not involve a formal intervention, at such other time as the Commission designates.

(23) The notice of intent:

(a) Must identify why the applicant meets the eligibility criteria listed in OAR 860-001-0840, explaining why the matter is an Eligible Proceeding. In the alternative, the applicant may identify any prior order deeming the organization an Eligible grantee and/or deeming the proceeding a Justice Grant Eligible Proceeding and granting Case Certification;

(b) Must be served on each affected Participating Public Utility, all Pre-certified Organizations, and all parties of record in the proceeding;

(c) Must identify the Participating Public Utility account or accounts from which the intervening party intends to request a Case Fund Grant.

(34) Any party or participant in the matter may provide a response to a request for Case Fund certification within 14 days of the filing of the request.

(45) Once certified, a Case Fund certified organization must submit to the Commission a proposed budget for its participation in an Eligible Proceeding. The proposed budget must include a statement of work, estimated eligible expenses, and a description of the Participating Public Utility account or accounts from which the applicant seeks funds and how the initial payment should be apportioned.

(56) A proposed budget must be filed no later than 30 days after the organization and the proceeding have been certified for ~~Justice-Case Fund grants funding~~ or by such other date as the Commission designates. A proposed budget may be filed with the notice of intent and request for case certification.

(67) An applicant may submit a combined proposed budget for related proceedings that are being considered concurrently by the Commission.

(78) If the recipient expects to incur Eligible Expenses for Case Funds in more than one calendar year, the proposed budget may seek funds that will be made available in the next calendar year. In such cases, the proposed budget should identify the amount of funds requested from each year's fund.

(89) Any party or participant in the matter may provide a response to a proposed budget within 14 days of the filing of the proposed budget.

(94) The Commission may approve or deny, in whole or in part, an applicant's proposed budget based on any of the following factors:

- (a) The proposal is not consistent with the breadth and complexity of the issues;
- (b) The degree to which any policy issues affect the interests of low-income residential customers or the interests of residential customers that are members of Environmental Justice Communities;
- (c) The procedural schedule;
- (d) The dollar magnitude of the issues at stake;
- (e) The qualifications of the organization and experience before the Commission;
- (f) The level of available Case Funds remaining for the year; and
- (g) Other Eligible Proceedings in which other Eligible Recipients may seek additional funds consistent with ORS 757.072(2)(c).

(104) The Commission will make best efforts to act upon proposed budgets for Case Fund gGrants within 30 days of receiving the proposed budgets.

(112) If the Commission receives one or more notices of intent and one or more proposed budgets, then the Commission will determine the amount of Case Fund gGrants that will be made available for the Eligible Proceeding and the allocation of that amount among the applicants. The Commission may make these determinations upon the factors described in the [Agreement approved by the Commission and found online at https://apps.puc.state.or.us/orders/2023ords/23-033.pdf](https://apps.puc.state.or.us/orders/2023ords/23-033.pdf).

(123) At any time during a proceeding, a Case Fund rGrant recipient may file to amend its budget and request additional funding due to unforeseen changes in the scope or complexity of issues, positions taken by other parties, changes in the schedule of the case, or other good cause. Grantees with approved budgets in multiple dockets may request to reallocate approved amounts between dockets by filing a request in both dockets. The request must identify the previously approved proposed budget amounts, the amended proposed budget amounts for each docket after reallocation of funds; and the request must explain the purpose for the requested reallocation. Any party or participant in the matter may provide a response to a proposed amendment within 14 days of the filing of the request. The Commission will make best efforts to act upon the request within 21 days of receiving the proposed amendment or, if applicable, any supplemental information provided in response to the Commission's request.

(134) The Commission may amend an approved proposed budget if it finds that there has been a material change in the breadth and complexity of the issues, the significance of the policy issues, or the dollar magnitude at stake, such that the initial approved proposed budget is no longer warranted. If the Commission amends an approved proposed budget, it will provide notice to the recipient and afford an opportunity to comment and provide a revised budget. A Commission amendment of an approved proposed budget takes effect on a prospective basis only.

(145) Pre-certified organizations and organizations who become Case-certified for a specific proceeding are eligible to receive Case Fund gGrants.

(156) The Commission may approve a Case Fund gGrant from funds that will be made available in the next calendar year when the proceeding for which the Case Fund gGrant is sought

is expected to continue into that year and funds in the current year Case Fund are inadequate to provide the level grant that the Commission determines is appropriate.

Stat. Authority: ORS 757.072

Stat. Implemented: ORS 757.072

OAR 860-001-0870

Eligible Expenses

- (1) Eligible Expenses include:
- (a) Actual attorney and consultant fees, whether in-house or for outside services, directly attributable to participation in the proceeding;
 - (b) Expert witness fees and expenses;
 - (c) Apportioned wages for in-house staff and operational support directly related to participation in the proceeding;
 - (d) The cost of investigations and of preparing and copying studies, data request responses and other discovery materials, exhibits, testimony, briefs, and other filings in the proceeding;
 - (e) Travel costs directly related to participation in the proceeding;
 - (f) Costs of acquiring studies or supplies directly related to the proceeding or court reporter fees and transcripts;
 - (g) Costs for education, organization, preparation for and facilitation of community members' participation in proceedings or an individual community member's participation in a proceeding;
 - (h) Costs of participation in workshops and other informal Commission activities prior to the institution of an Eligible Proceeding; and
 - (i) Cost of contractors and subcontractors conducting activities that would otherwise constitute an eligible expense under this definition had they been directly incurred by the Grantee.
- (2) Justice Funding Grants may not be used political activities or fund raising.
- (3) Pre-certification grants may not be used for complaint proceedings before the Commission.

Stat. Authority: ORS 757.072

Stat. Implemented: ORS 757.072

OAR 860-001-0890

Payment of Grants and Reporting

- (1) Upon Commission approval of a Pre-certified Fund grant or approval of a request for payment from a Case Fund, the Participating Public Utilities must pay the amounts granted pursuant to Commission order. The Participating Public Utilities must pay the amount authorized by the Commission no later than 30 days after receipt of the Commission order.
- (2) To receive payment of a Case Fund Grant, a grantee must submit a request for payment of Eligible Expenses to the Commission and serve a copy on the Participating Public Utility from whose account payment is to be made. If the grantee intends to release funds not used, the grantee may file a release of funds.
- (3) A request for payment or notice of release of funds may be made at any time during an Eligible Proceeding, after the Commission has approved the applicable proposed budget, but grantees should file the request for payment and notice of release no later than November 17, at which time the Commission will issue a final notice to grantees requiring all requests for payment

and notices of release by December 15. Grantees who fail to file a request for payment or notice of release by December 15 will be deemed to have released any remaining allocated funds back to the applicable Case Fund.

(4) The request for payment must:

(a) Itemize the expenses, payees and hourly rates for amounts to be reimbursed, including billing details, and including separately identified amounts for consultant or expert witness fees and travel expenses;

(b) Demonstrate that the expenses are reasonable and are directly attributable to issues and positions pursued on behalf of low-income residential customers or Environmental Justice Communities and consistent with the grantee's proposed budget;

(c) Provide information sufficient to show that the grantee has complied with any condition or requirement of the Case Fund Grant; and

(d) Specify whether the request for payment is for a progress payment or final payment in full and indicate whether any approved budget amount may be released back to the applicable Case Fund because the grantee does not intend to request payment for the full approved budget amount.

(5) A request for payment under this section may be made as a progress payment prior to the completion of the activity to be performed consistent with an approved budget; provided that any request for payment prior to completion of the activity may not exceed 50 percent of the applicable approved budget.

(6) Any person may provide a response to a request for payment of a Case Fund Grant or Pre-certification Fund Grant within 14 days of the filing of the request. Within 30 days of receiving a request for payment of a Case Fund Grant or Pre-certification Fund Grant, the Commission will make best efforts to review the sufficiency of the request and act upon it. The Commission may disallow a request for payment, in whole or in part, if it determines that the request seeks reimbursement for expenses that are not Eligible Expenses or expenses that are inconsistent with the Grantee's Case Fund Grant or Pre-certification Fund Grant, or any conditions placed on the Case Fund Grant or Pre-certification Fund Grant.

(7) On or before each April 1, each Case-Fund recipient who had, during the prior calendar year, a continuing or newly approved Case Fund Grant or pending proposed budget for an Case Fund Grant request must provide a report the Administrative Hearings Division showing, as of December 31 of the prior calendar year for each Case Fund, their budget requests pending approval, approved budget amounts, requested payments, payments received, amounts actually spent on expenses described in budgets for proceedings in which the intervenor received an Case Fund Grant, and a statement indicating whether any of their approved budget amounts for an Case Fund Grant may be released back to the applicable Case Fund because the grantee does not intend to use the full approved amount.

(8) Each August 1 during the term of the ~~Agreement approved by the Commission and found online at <https://apps.puc.state.or.us/orders/2023ords/23-033.pdf>~~; Pre-certified Organizations will provide the Administrative Hearings Division a statement setting forth the manner in which the Pre-certification Fund Grant was spent or intends to be spent, including information sufficient to show that the funds were spent in a manner consistent with these rules, whether a request for payment for remaining amounts has been filed, the remaining amount outstanding and whether the remaining amount or any initial amount will be released back to the fund. Each Pre-certified Organization will serve a copy of the report it provides under this section on the applicable Participating Public Utility or Utilities.

(9) Information presented ~~under consistent with this rule OAR 860-001-0890~~ may be provided by gGrantees or Eligible Recipients directly to the Administrative Hearings Division with copies served upon the relevant Participating Public Utilities and may be designated as confidential and protected from public disclosure by the Commission to the maximum extent possible under the Oregon Public Records Law. The confidential designation will not prevent the applicable Participating Public Utility from reviewing the requests, budgets, or reports. If the order approving a budget includes confidentiality obligations or if the information is provided pursuant to a protective order, the applicable Participating Public Utility will abide any such applicable confidentiality obligations. Grantees and Eligible Recipients acknowledge that information covered by this rule may be assimilated into reports pursuant to ORS 757.072.

Stat. Authority: ORS 757.072

Stat. Implemented: ORS 757.072

OAR 860-001-0900

Recovery of Justice Funding Grants and Cost Allocation

(1) Participating Public Utilities are permitted to recover in rates all amounts paid for Justice Funding Grants.

(a) If a Participating Public Utility seeks rate recovery through a deferred account, the account and amortization of the account is exempt from the amortization caps and earnings test set forth in subsections 5, 6, 7, 8 and 10 of ORS 757.259, as such subsections may be amended from time to time, and is not included in any calculation of the amortization cap for other deferred accounts.

(b) Amounts in any deferred account under this rule will include carrying costs at the Participating Public Utility's authorized cost of capital.

(c) If the applicable Eligible Proceeding results in a change of rates, Case Fund gGrants should be incorporated into rates at the same time as the rate change is made.

(d) For Case Fund gGrants that are not recovered in the Eligible Proceeding in which the funds were expended or when recovering Pre-certification gGrants, the timing and amortization period for recovering of such Justice Funding Grants will be left to the discretion of the Participating Public Utility, subject to Commission approval.

(2) In a proceeding involving more than one Participating Public Utility, the Commission will apportion the payment among the affected Participating Public Utilities.

(a) Criteria for making this allocation may include the relative gross revenue of the utilities, load, or other such factors as the Commission determines to be relevant to the matter.

(b) Payment will be apportioned to Avista, Cascade, and Idaho Power solely for Case Fund gGrants for matters affecting low-income residential customers or Environmental Justice Communities in the respective service area.

(c) Case Fund gGrants used to advocate positions on behalf of low-income residential customers or Environmental Justice Communities may be assessed as determined by the Commission.

Stat. Authority: ORS 757.072

Stat. Implemented: ORS 757.072