

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 426

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|--------------------------------------|---|--------------------------|
| In the Matter of |) | |
| |) | CUB REQUEST FOR AN ISSUE |
| Idaho Power Company, |) | FUND GRANT & PROPOSED |
| |) | BUDGET |
| Request for a General Rate Revision. |) | |
| _____ |) | |

The Oregon Citizens' Utility Board (“CUB”) requests a grant of \$53,000 from the 2024 Idaho Power Issue Fund. CUB has been tracking its participation in this docket by hours and activity. CUB apologizes for the timeliness of this filing. While the deadline to file budgets for intervenor funding in this proceeding was set for February 5, 2023, CUB was unable to meet this deadline due to the press of regulatory business, annual nonprofit audit, and onboarding new staff members. CUB respectfully requests waiver of this deadline and apologizes for any inconvenience placed on the Commission or parties.

CUB is pre-certified per OAR 860-001-0120(3)(a). UE 426 is an eligible proceeding under the Intervenor Funding Agreement (IFA), approved by the Oregon Public Utility Commission in Order No. 20-493, entered December 29, 2020. 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 any Commission proceeding that directly affects Idaho Power including but not limited to, rulemaking proceedings, declaratory ruling proceedings and contested case proceedings” IFA, Article 1(b).; 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 and Issue Fund Grant to file a

Notice of Intent to Request an Issue Fund Grant. CUB filed its Notice of Intent to Request an Issue Fund Grant on March 5th, 2024, as required by the IFA (Article 6.2).

Article 6.3 of the IFA requires an intervenor seeking an Issue Fund Grant to file a proposed budget within 30 days after the prehearing conference at which the schedule for the proceeding is established.

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 will participate in the prehearing conference and will participate in all workshops and settlement meetings. CUB will also attend and participate in the hearing scheduled for this docket. CUB will review and analyze the testimony filed in this docket and will review the briefs yet to be filed. We will pursue discovery of Idaho Power's rate revision request through data requests and we will respond to data requests asked of us. We will file testimony and briefs.

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

- i. Capital investments are included in this general rate request to determine whether they were prudently incurred,
- ii. Review any policy items, including the reasonableness of the company's proposal to revise its rates,
- iii. Examine issues related to rate spread and rate design,
- iv. Examine the rate shock implications of the increase, and
- v. Examine all other issues raised by other parties to this proceeding.

(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 \$53,000 grant from the 2024 Idaho Power Issue Fund. CUB respectfully requests that the Commission approve CUB's request for a \$53,000 grant from the 2024 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 6th day of March, 2024.

Respectfully submitted,

/s/Jennifer Hill-Hart

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