BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 179

)

In the Matter of

PACIFIC POWER & LIGHT,

Request for a General Rate Increase in the Company's Oregon Annual Revenues CUB Request for PacifiCorp Issue Fund Grant & Proposed Budget

The Citizens' Utility Board of Oregon (CUB) requests a grant of \$44,900 from the PacifiCorp Issue Fund.

CUB is precertified as per OAR 860-012-0100(3)(a). UE 179 is an eligible proceeding under the Intervenor Funding Agreement, adopted by the Commission in Order No. 03-388 (July 2, 2003), because the proceeding directly affects PacifiCorp, a participating public utility. Agreement, 1(c). CUB filed its Notice of Intent to Request a PacifiCorp Issue Fund Grant concurrent with its Notice of Intervention on February 24, 2006, as required by the Intervenor Funding Agreement. Agreement 6.2.

Pursuant to paragraph 6.3 of the Intervenor Funding Agreement, the proposed budget must identify certain points of information. We provide the information below.

1) Statement of Work to be Performed: CUB intends to participate in every procedural aspect of this case. We participated in the pre-hearing conference. We will attend and participate in all or most workshops, hearings and settlement meetings. We will review and analyze opening

testimony, supplemental testimony, rebuttal testimony, surrebuttal testimony, and briefs filed by PacifiCorp as well as testimony, surrebuttal testimony, and briefs filed by other parties. We will pursue extensive discovery of PacifiCorp through data requests, and we will respond to data requests asked of us. We will file testimony, surrebuttal testimony and briefs. We will develop positions on many, if not most, major issues related to revenue requirement, marginal cost allocation, rate spread, and rate design.

- 2) Description of Areas to be Investigated: CUB intends to investigate many issues related to this application, including, but not limited to the following:
 - A. The overall revenue requirement proposed by PacifiCorp, including the cost of capital, net power costs, taxes, and medical and pension costs.
 - B. The effect of MEHC's ownership on the forecast of tax amounts, employee levels, affiliate relations and other costs.
 - C. The implementation of the rate credits associated with the stipulation in UM 1209.
 - D. The Company's marginal cost study and its proposed allocation of costs between customer classes (rate spread).
 - E. The Company's proposed rate design.
- *3) 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.
- *4) The Specific Fund from which CUB Seeks an Issue Fund Grant:* CUB is seeking an Issue Fund Grant from the PacifiCorp Issue Fund.

5) The Budget Showing Estimated Fees and Costs: CUB's budget is included as Attachment 1. CUB's budget includes half the cost associated with a cost-of-capital expert witness that CUB intends to hire in conjunction with ICNU. CUB and ICNU intend to share the cost of this witness as envisioned in section 6.6 of the Intervenor Funding Agreement. The total budget is more than \$100,000, but CUB's grant request is for \$44,900 which reflects a sharing of available issues fund grants between CUB and ICNU in this case. We know of no other party which will be requesting an issues grant in this case or any other PacifiCorp docket in 2006. This request assumes a fully litigated case; settlement of some or all issues could reduce the ultimate request for reimbursement. CUB staff will keep track of its participation by hours and activity.

> Dated this 8th of May, 2006. Respectfully submitted,

Voson Eisdorf

Jason Eisdorfer #92292 Attorney for Citizens' Utility Board of Oregon

Attachment 1

UE 179 Intervenor Funding Issue Fund Budget

CUB Internal Expenses	Rate	Hours	Cost
Staff:			
Bob Jenks, Executive Director	\$115.00	275	\$31,625
Jason Eisdorfer, Attorney	\$150.00	250	\$37,500
Lowrey Brown, Utility Analyst	\$75.00	300	\$22,500
Shannon Floyd, Business & Projects Mgr	\$40.00	40	\$1,600
Other Expenses:			
Printing & Mailing			\$950
Travel			\$1,200
CUB Consultant Expenses	Rate	Hours	Cost
CUB Share of ROE Consultant			\$10,500
			<i><i><i></i></i></i>
Other Expenses:			
Airfare			\$750
Airport Mileage			\$81
Lodging			\$450
Local Transportation			\$150
Per Diem			\$210
Shipping			\$250

Total

\$107,766

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of May, 2006, I served the foregoing Intervenor Funding Budget of the Citizens' Utility Board of Oregon in docket UE 179 upon each party listed below, by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending 6 copies by U.S. mail, postage prepaid, to the Commission's Salem offices.

Respectfully submitted,

escla

Jason Eisdorfer #92292 Attorney for Citizens' Utility Board of Oregon

W=Waive Paper service, Q=Confidential

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