

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 180**

In the Matter of	)	
	)	CUB Request for PGE Issue Fund
	)	Grant & Proposed Budget
Portland General Electric,	)	
	)	
Request for a General Rate Increase in the	)	
Company's Oregon Annual Revenues.	)	
_____	)	

The Citizens' Utility Board of Oregon (CUB) requests a grant of \$95,000 from the PGE Issue Fund.

CUB is precertified as per OAR 860-012-0100(3)(a). UE 180 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 PGE, a participating public utility. Agreement, 1(c). CUB filed its Notice of Intent to Request a PGE Issue Fund Grant concurrent with its Notice of Intervention on March 20, 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 PGE as well as testimony, surrebuttal testimony, and briefs filed by other parties. We will pursue extensive discovery of PGE 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 PGE, including the cost of capital, net power costs, taxes, and medical and pension costs.
- B. The proposed Power Cost Adjustment, its allocation of risks and its overall reasonableness.
- C. The costs and benefits associated with the Company's proposed AMR metering system.
- D. The prudence and cost projections for PGE's Port Westward power plant.
- E. The timing of the Company's Port Westward power plant, whether it is used and useful in the forecasted test year, and what impacts any delays in its construction might have on this rate case.
- G. The rate spread and rate design, including the value of inverted rates and price signals.

3) *Description of the Class or Classes Benefiting from CUB's Participation:* CUB represents the interests of PGE'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 PGE 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 \$112,000; however, CUB is only requesting a grant of \$95,000. We believe that the PGE Issue Fund will accommodate this request, along with reasonable budgets for ICNU and the League of Cities. 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 30<sup>th</sup> day of May, 2006.  
Respectfully submitted,

A handwritten signature in black ink that reads "Jason Eisdorfer". The signature is written in a cursive style with a long horizontal flourish extending to the right.

---

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

## Attachment 1

### UE 180 Intervenor Funding Budget

<b>CUB Internal Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
<i>Staff:</i>			
Bob Jenks, Executive Director	\$115.00	275	\$31,625
Jason Eisdorfer, Attorney	\$150.00	250	\$37,500
Lowrey Brown, Utility Analyst	\$75.00	325	\$24,375
Shannon Floyd, Business and Projects Mgr	\$40.00	40	\$1,600
<i>Other Expenses:</i>			
Printing & Mailing			\$950
Travel			\$1,500

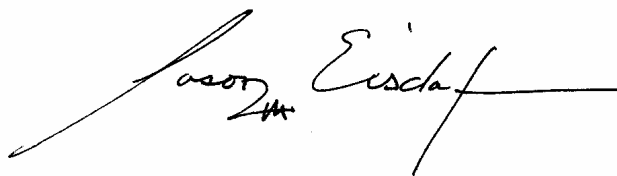
<b>CUB Consultant Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
CUB Share of ROE Consultant			\$13,750
<i>Other Expenses:</i>			
Airfare			\$500
Airport Mileage			\$75
Lodging			\$300
Local Transportation			\$100
Per Diem			\$150
Shipping			\$150

**Total** **\$112,575**

## CERTIFICATE OF SERVICE

I hereby certify that on this 30<sup>th</sup> day of May, 2006, I served the foregoing Intervenor Funding Budget of the Citizens' Utility Board of Oregon in docket UE 180 upon each party listed below, by email and 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,



Jason Eisdorfer #92292  
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**W=Waive Paper service, Q=Confidential**

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