

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 222

In the Matter of)	
)	CUB REQUEST FOR AN
IDAHO POWER COMPANY)	IDAHO POWER ISSUE FUND
)	GRANT & PROPOSED BUDGET
2011 Annual Power Cost Update)	
<hr/>)	

The Citizens' Utility Board of Oregon (CUB) requests a grant of \$9217 from the Idaho Power Issue Fund. This presumes a fully litigated case; settlement of some or all of the issues would likely reduce our total request for reimbursement. CUB staff will keep track of their participation by hours and activity.

CUB is precertified as per OAR 860-012-0100(3)(a). UE 222 is an eligible proceeding under the Intervenor Funding Agreement, adopted by the Commission on December 19, 2007 in Order No. 07-564, because the proceeding directly affects Idaho Power, a participating public utility (Agreement 1(k)). CUB filed its Notice of Intent to Request a Idaho Power Issue Fund Grant concurrent with its Notice of Intervention, 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.

(a) 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, settlement meetings, hearings, and Commission presentations. We will review and analyze Idaho Power's testimony and briefs as well as their associated errata and exhibits. We will likewise review and analyze testimony and briefs filed by other parties. We will pursue discovery of Idaho Power through data requests, and will respond to data requests asked of us. We will file testimony and briefs, and present our recommendations to the Commission,

including any proposed modifications or conditions.

(b) *Description of Areas To Be Investigated:* CUB intends to investigate issues including, but not limited to:

- A. Idaho Power's net power costs;
- B. Idaho Power's use of the AURORA model to calculate power supply expenses
- C. Changes in Idaho Power's system loads since its last filing; and
- D. Idaho Power's load forecast.

(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 an issue fund grant from the Idaho Power Issue Fund. CUB's proposed budget of \$9217 would leave roughly \$20,783 uncommitted in the Idaho Power Issue Fund, which currently has an uncommitted balance of approximately \$30,000.

(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 accompanies this document as Attachment A.

Dated this 4th day of January, 2011

Respectfully submitted,



John C. Sturm, Attorney #105174
Staff Attorney
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CUB Proposed Budget -- UE 222

CUB Internal Expenses	Rate	Hours	Cost
<i>Staff</i>			
Bob Jenks, Executive Director	\$200	20.00	\$4,000.00
Catriona McCracken, Senior Attorney	\$200	17.00	\$3,400.00
Ray Meyers, Attorney	\$150	3.00	\$450.00
Gordon Feighner, Utility Analyst	\$125	25.00	\$3,125.00
SA Anders, Business and Projects Mgr	\$75	3.00	\$225.00
John Strum, Attorney	\$125	2.00	\$250.00
<i>Other Expenses</i>			
Printing & Mailing			\$4.95
Travel			\$65.70
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In-House Resources			
20% of Eligible Expenses			(\$2,304)
Total			\$9,217

UE 222 – CERTIFICATE OF SERVICE

I hereby certify that, on this 4th day of January, 2011, I served the foregoing CUB REQUEST FOR AN IDAHO POWER ISSUE FUND GRANT & PROPOSED BUDGET in docket UE 222 upon each party listed in the UE 222 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one copy and one original by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "John C. Sturm".

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