

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 283**

In the Matter of	)	
	)	CUB’S SECOND AMENDED
	)	REQUEST FOR AN ISSUE FUND
PORTLAND GENERAL ELECTRIC	)	GRANT & PROPOSED BUDGET
COMPANY	)	
	)	
Request for a General Rate Revision	)	
_____	)	

The Citizens' Utility Board of Oregon (“CUB”) hereby files its Second Amended Request for an Issue Fund Grant and amended budget in docket UE 283. As stated in CUB’s initial Request for an Issue Fund Grant, Attachment A, due to outstanding budget requests in other Portland General Electric (“PGE”) dockets, CUB requested a \$45,000 Issue Fund Grant despite showing eligible expenses of \$100,950. On July 8, 2014, CUB filed a request to amend its initial budget to include uncommitted funds, with its new budget request totaling \$50,313.74. The Commission approved CUB’s request on July 9, 2014 in Order No. 14-255. CUB has since released funds in dockets UE 286 and UM 1679 totaling \$17,148.16. Accordingly, CUB now requests that the Commission approve CUB’s Amended Request for an Issue Fund Grant in the amount of \$67,461.90. CUB’s proposed budget in this docket, showing eligible expenses of \$100,950, remains unchanged. CUB staff will continue to keep track of their participation by hours and activity.

CUB is precertified as per OAR 860-001-0120(3)(a). UE 283 is an eligible proceeding under the Second Amended and Restated Intervenor Funding Agreement

(“IFA”), as approved by the Oregon Public Utility Commission in Order No. 12-452, entered November 20, 2012. The proceeding directly affects PGE, which is a participating public utility under the IFA. *See* Order No. 12-452 at Article 1(k). CUB filed its Notice of Intent to Request an Issue Fund Grant concurrent with its Notice of Intervention, as required by the IFA (Article 6.2).

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 will continue to participate in every procedural aspect of this case. CUB participated in the pre-hearing conference, and has attended and participated in all settlement conferences, Commission presentations and public meetings. We have reviewed and analyzed PGE’s testimony, as well as the testimony filed by other parties to this docket. We have pursued discovery of PGE through data requests, and have responded to data requests asked of us. We have filed testimony, stipulations, and joint testimony, and will participate in oral argument or any additional regulatory process that may be required.

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

- A. PGE’s proposed policy change to the PCAM and how it interacts with the RFP process, among other things;
- B. The prudence PGE’s two new rate base additions;
- C. The timing of PGE’s proposed three general rate changes;
- D. The marginal cost of services study to ensure fair allocation of costs to customers;

E. Whether the test year budget will acquire all cost effective energy efficiency;  
and

F. Issues raised by other parties to the proceeding.

*(c) 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.

*(d) The Fund from Which CUB Seeks an Issue Fund Grant & Available Funds:*

CUB is seeking an issue fund grant from the PGE Issue Fund. CUB's budget shows eligible expenses of \$100,950; however, CUB requests to amend its issue fund grant in the amount of \$67,461.90 due to the availability of funds in PGE's issue fund account.

*(e) The Budget Showing Estimated Fees and Costs:*

CUB's amended budget accompanies this document as Attachment A.

*(f) A Representation of the Use of Matching Funds:*

The amended budget and an accounting for the use of matching funds accompany this document as Attachment A.

Dated this 26<sup>th</sup> day of September, 2014  
Respectfully submitted,



Bob Jenks  
Executive Director  
Citizens' Utility Board of Oregon

## CUB Second Amended Proposed Budget -- UE 283

<b>CUB Internal Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
<i>Staff</i>			
Bob Jenks, Executive Director	\$250	120.00	\$30,000.00
Catriona McCracken, General Counsel	\$250	130.00	\$32,500.00
Jaime McGovern, Sr. Utility Analyst	\$150	50.00	\$7,500.00
Nadine Hanhan, Utility Analyst	\$125	100.00	\$12,500.00
Sommer Templet, Staff Attorney	\$175	100.00	\$17,500.00
Law Clerk	\$75	10.00	\$750.00
 <i>Other Expenses</i>			
Printing & Mailing			\$50.00
Travel			\$150.00
<hr/>			
<b>In-House Resources</b>			
20% of Eligible Expenses			(\$20,190)
<b>Total</b>			<b>\$80,760</b>
CUB Initial Request*			\$45,000.00
<b>CUB Amended Request*</b>			<b>\$67,461.90</b>

## UE 283 – CERTIFICATE OF SERVICE

I hereby certify that, on this 26<sup>th</sup> day of September, 2014, I served the foregoing CUB'S SECOND AMENDED REQUEST FOR AN ISSUE FUND GRANT & PROPOSED BUDGET in docket UE 283 upon each party listed in the UE 283 PUC 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 original and one copy 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)

W **BOEHM KURTZ & LOWRY**

C KURT J BOEHM  
36 E SEVENTH ST - STE 1510  
CINCINNATI OH 45202  
[kboehm@bkllawfirm.com](mailto:kboehm@bkllawfirm.com)

W **BOEHM KURTZ & LOWRY**

JODY KYLER COHN  
36 E SEVENTH ST STE 1510  
CINCINNATI OH 45202  
[jkyler@bkllawfirm.com](mailto:jkyler@bkllawfirm.com)

W **CITY OF PORTLAND - CITY ATTORNEY'S OFFICE**

BENJAMIN WALTERS  
1221 SW 4TH AVE - RM 430  
PORTLAND OR 97204  
[ben.walters@portlandoregon.gov](mailto:ben.walters@portlandoregon.gov)

W **CITY OF PORTLAND - PLANNING & SUSTAINABILITY**

DAVID TOOZE  
1900 SW 4TH STE 7100  
PORTLAND OR 97201  
[david.tooze@portlandoregon.gov](mailto:david.tooze@portlandoregon.gov)

W **DAVISON VAN CLEVE**

C TYLER C PEPPLER  
333 SW TAYLOR - STE 400  
PORTLAND OR 97204  
[tcp@dvclaw.com](mailto:tcp@dvclaw.com)

W **DAVISON VAN CLEVE**

C S BRADLEY VAN CLEVE  
333 SW TAYLOR - STE 400  
PORTLAND OR 97204  
[bvc@dvclaw.com](mailto:bvc@dvclaw.com)

W **ENERGY STRATEGIES LLC**

C KEVIN HIGGINS  
215 STATE ST - STE 200  
SALT LAKE CITY UT 84111-2322  
[khiggins@energystrat.com](mailto:khiggins@energystrat.com)

W **FRED MEYER STORES/KROGER**

NONA SOLTERO  
3800 SE 22ND AVE  
PORTLAND OR 97202  
[nona.soltero@fredmeyer.com](mailto:nona.soltero@fredmeyer.com)

W **MOUNTAIN WEST ANALYTICS**

C BRADLEY MULLINS  
333 SW TAYLOR STE 400  
PORTLAND OR 97204  
[brmullins@mwanalytics.com](mailto:brmullins@mwanalytics.com)

W **NOBLE AMERICAS ENERGY SOLUTIONS, LLC**

GREG BASS  
401 WEST A ST., STE. 500  
SAN DIEGO CA 92101  
[gbass@noblesolutions.com](mailto:gbass@noblesolutions.com)

**W NORTHWEST NATURAL**  
E-FILING  
220 NW 2ND AVE  
PORTLAND OR 97209  
[efiling@nwnatural.com](mailto:efiling@nwnatural.com)

**W NORTHWEST NATURAL**  
MARK R THOMPSON  
220 NW 2ND AVE  
PORTLAND OR 97209  
[mark.thompson@nwnatural.com](mailto:mark.thompson@nwnatural.com)

**W NW ENERGY COALITION**  
**C WENDY GERLITZ**  
1205 SE FLAVEL  
PORTLAND OR 97202  
[wendy@nwenergy.org](mailto:wendy@nwenergy.org)

**W PACIFIC POWER**  
SARAH WALLACE  
825 NE MULTNOMAH ST STE 1800  
PORTLAND OR 97232  
[sarah.wallace@pacificorp.com](mailto:sarah.wallace@pacificorp.com)

**W PACIFICORP**  
OREGON DOCKETS  
825 NE MULTNOMAH ST, STE 2000  
PORTLAND OR 97232  
[oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)

**W PORTLAND GENERAL ELECTRIC**  
**C DOUGLAS C TINGEY**  
121 SW SALMON 1WTC13  
PORTLAND OR 97204  
[doug.tingey@pgn.com](mailto:doug.tingey@pgn.com)

**W PORTLAND GENERAL ELECTRIC**  
**C JAY TINKER**  
121 SW SALMON ST 1WTC-0702  
PORTLAND OR 97204  
[pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

**W PUC STAFF—DOJ**  
STEPHANIE S ANDRUS  
1162 COURT ST NE  
SALEM OR 97301-4096  
[stephanie.andrus@state.or.us](mailto:stephanie.andrus@state.or.us)

**W PUC STAFF**  
**C JUDY JOHNSON**  
PO BOX 1088  
SALEM OR 97308-1088  
[judy.johnson@state.or.us](mailto:judy.johnson@state.or.us)

**W RICHARDSON ADAMS, PLLC**  
GREGORY M. ADAMS  
PO BOX 7218  
BOISE ID 83702  
[greg@richardsonadams.com](mailto:greg@richardsonadams.com)

Respectfully submitted,



Sommer Templet, OSB #105260  
Staff Attorney  
Citizens' Utility Board of Oregon  
610 SW Broadway, Ste. 400  
Portland, OR 97205  
(503) 227-1984 phone  
(503) 224-2596 fax  
[sommer@oregoncub.org](mailto:sommer@oregoncub.org)

**From:** [Sommer Templet](#)  
**To:** [Dockets](#); [efiling@nwnatural.com](#); [oregondockets@pacificcorp.com](#); [greg@richardsonadams.com](#); [ANDRUS Stephanie](#); [gbass@noblesolutions.com](#); [kboehm@bkllawfirm.com](#); [wendy@nwenergy.org](#); [khiggins@energystat.com](#); [Bob Jenks](#); [JOHNSON Judy](#); [jkyler@bkllawfirm.com](#); [Catriona McCracken](#); [brmullins@mwanalytics.com](#); [tcp@dvclaw.com](#); [nona.soltero@fredmeyer.com](#); [mark.thompson@nwnatural.com](#); [doug.tingey@pgn.com](#); [pge.opuc.filings@pgn.com](#); [david.tooze@portlandoregon.gov](#); [bvc@dvclaw.com](#); [sarah.wallace@pacificcorp.com](#); [ben.walters@portlandoregon.gov](#)  
**Cc:** [PUC.FilingCenter](#)  
**Subject:** UE 283 - CUB"s Second Amended Request for an Issue Fund Grant  
**Date:** Friday, September 26, 2014 10:24:38 AM  
**Attachments:** [image001.jpg](#)  
[image003.jpg](#)  
[UE 283 - Certificate of Service, CUB"s Second Amended Request for Issue Fund Grant.pdf](#)  
[UE 283 - CUB"s Second Amended Issue Fund Grant Request.pdf](#)  
[UE 283 - Second Amended Attachment A, CUB Proposed Budget.pdf](#)

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All,

Please find attached CUB's Second Amended Request for an Issue Fund Grant, amended budget, and the corresponding certificate of service. This filing is intended to replace CUB's September 19, 2014 Request to Amend its Proposed Budget, which contained errors. Accordingly, CUB requests that its September 19, 2014 filing be withdrawn. The attached filing represents CUB's amended request for an issue fund grant in this docket.

Please contact this office should you have any difficulties opening the attached documents.

Thank you.

**Sommer Templet**

Staff Attorney

**Citizens' Utility Board of Oregon**

610 SW Broadway, Suite 400

Portland, OR 97205

T: 503-227-1984 x 23

F: 503-274-2956

[sommer@oregoncub.org](mailto:sommer@oregoncub.org)

<http://www.oregoncub.org>

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