BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 288

In the Matter of)))
AVISTA CORPORATION, DBA AVISTA UTILITIES')))
Request for a General Rate Revision))

CUB REQUEST FOR AN ISSUE FUND GRANT & PROPOSED BUDGET

The Citizens' Utility Board of Oregon ("CUB") estimates eligible expenses of \$64,020, after the 20% match, and requests a grant of \$44,800 from the Avista Utilities ("Avista") Issue Fund. CUB requests that \$19,800 be granted from the 2015 Avista Issue Fund and \$25,000 be granted from the 2016 Avista Issue Fund. CUB staff have been tracking their participation in this docket by hours and activity.

CUB is precertified per OAR 860-012-0100(3)(a). UG 288 is an eligible proceeding under the Third Amended and Restated Intervenor Funding Agreement ("IFA"), as approved by the Oregon Public Utility Commission in Order No. 15-335, entered October 20, 2015. The proceeding directly affects Avista, which is a participating public utility under the IFA. *See* IFA 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). CUB respectfully requests a waiver of the requirement to file its proposed budget by June 30, 2015 per Judge Power's June 5, 2015 prehearing conference

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memorandum.¹ At the time that budgets were due in this docket, there were no available funds in Avista's 2015 Issue Fund.

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 participated in the prehearing conference, all workshops, and settlement meetings. CUB will also attend and participate in the hearing scheduled for this docket. CUB has reviewed and analyzed the testimony and briefs filed in this docket, and will review the briefs yet to be filed. We have pursued discovery of Avista through data requests. We have filed testimony and a prehearing brief, and will participate in the hearing and file a post-hearing brief in this docket.
- (b) Description of Areas to Be Investigated: CUB investigated issues including, but not limited to:
 - A. Rate base additions, including pipeline replacement;
 - B. Rate spread and rate design;
 - C. Avista's asset management program;
 - D. The allocation of costs across Avista's system; and
 - E. 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 Avista'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

¹ See IFA Article 6.3.

seeking a \$19,800 grant from the 2015 Avista Issue Fund and a \$25,000 grant from the 2016 Avista Issue Fund. CUB's budget shows eligible expenses, after the match, of \$64,020, but CUB limits its request in this case to \$44,800 due to future Avista dockets and in consideration of requests that may be made by other intervenors. Section 4.4 of the IFA permits the Commission to "approve an Issue Fund Grant from funds that will be made available in the next calendar year when the proceeding for which the Issue Fund are inadequate to provide the level of Issue Fund Grants that the Commission determines is appropriate." Although some work and settlement conferences for UG 288 took place in 2015, significant activity is expected to take place in 2016. Given the limited funds available in Avista's 2015 Issue Fund, CUB respectfully requests that the Commission approve CUB's request for a \$19,800 grant from the 2015 Avista Issue Fund and a \$25,000 grant from the 2016 Avista 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 24th day of November, 2015 Respectfully submitted,

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Bob Jenks Executive Director Citizens' Utility Board of Oregon

CUB Proposed Budget -- UG 288

CUB Internal Expenses	Rate	Hours	Cost
Staff			
Bob Jenks, Executive Director	\$250	80.00	\$20,000.00
Jaime McGovern, Senior Economist	\$225	130.00	\$29,250.00
Nadine Hanhan, Utility Analyst	\$125	15.00	\$1,875.00
Sommer Templet, Staff Attorney	\$175	110.00	\$19,250.00
Paralegal	\$75	20.00	\$1,500.00
<i>Other Expenses</i> Printing, Mailing & Travel Outside Expert Witness			\$150.00 \$8,000.00

In-House Resources	
20% of Eligible Expenses	(\$16,005)
Total	\$64,020
Budget Request	\$44,800.00