BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1929 & UM 2126

	1			
In the Matter of)			
PUBLIC UTILITY COMMISSION OF OREGON,)			
The Fourth Amended and Restated Intervenor Funding Agreement)))			
and)			
)			
IDAHO POWER COMPANY,,)			
In the Matter of the Intervenor Funding)			
Agreement between Idaho Power Company)			
and Oregon Citizens' Utility Board for Period 2021-2025.				
reflod 2021-2023.)			
)			

INTERVENORS' REPORT OF THE CITIZENS' UTILITY BOARD



April 1, 2022

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1929 & UM 2126

)
In the Matter of)
PUBLIC UTILITY COMMISSION OF OREGON,)))
The Fourth Amended and Restated)
Intervenor Funding Agreement) INTERVENORS' REPORT
) OF THE
and) CITIZENS' UTILITY BOARD
In the Matter of the Intervenor Funding Agreement by and among)))
IDAHO POWER COMPANY and the CITIZENS' UTILITY BOARD.)))
)
)

This Intervenors' Report is intended to comply with Section 6.8 of the Fourth Amended and Restated Intervenor Funding Agreement ("IFA")¹ and Section 6.7 of the Idaho Power Company and Citizens' Utility Board Intervenor Funding Agreement ("Idaho Power IFA").²

Summary of 2021 Issue Fund Activity

Section 6.8(a) of the IFA and Section 6.7(a) of the Idaho Power IFA dictate that each intervenor shall submit a summary of its continuing and newly-approved Issue Fund Grants, as well as pending proposed budgets for Issue Fund Grants in the prior year. Attached is a table containing this information: CUB Summary of 2021 Issue Fund Activity.

¹ The Fourth Amended and Restated Intervenor Funding Agreement was approved by the Commission in Order No. 18-017 (January 17, 2018).

² The 2021-2025 Idaho Power-CUB Intervenor Funding Agreement was approved by the Commission in Order No. 20-493 (December 29, 2020).

Expenditures for Intervenor Participation

Section 6.8(c)(1) of the IFA and Section 6.7(b)(1) of the Idaho Power IFA dictate that, in the Intervenors' Report, the intervenor shall include a statement showing the total expenditures the intervenor incurred participating in all proceedings affecting the Participating Public Utilities before the Commission. The IFA requires a showing of total expenditures in each of the prior five calendar years;³ the Idaho Power IFA requires a showing of estimated expenditures for the prior calendar year.⁴

CUB understands the primary purpose of this to be a demonstration of how the members of the intervening organization are financially supporting the regulatory work being done on their behalf.

CUB is unusual among intervenors, since most of our regulatory work is done by CUB staff, rather than contracted attorneys and consultants. For CUB, this structure is important, as it reduces costs and increases our in-house expertise. However, this structure means we do not typically have invoices from consultants for most of the dockets, and our cost of participation includes a share of our rent and other overhead. In 2021, CUB hired a consultant to provide analysis for a matter before the PUC. The cost below is based on the cost of the CUB regulatory staff, plus overhead and consultant fees for a PUC matter, and excludes the cost of CUB staff that do not participate before the PUC.

The table below is our best estimate of CUB expenditures associated with participating in PUC cases affecting the participating utilities.

Year	Expenditures
2021	\$498,121
2020	\$473,436
2019	\$554,752
2018	\$466,735
2017	\$461,235
2016	\$509,471

³ IFA Article 6.8(c)(1).

⁴ Idaho Power Article 6.7(b)(1).

Expenditures for Which Payment Was Requested

Section 6.8(c)(2) of the IFA and Section 6.7(b)(2) of the Idaho Power IFA requests a statement showing the amount of expenditures the intervenor incurred while working on proceedings affecting participating public utilities in the prior calendar year. The incurred amounts reflect our participation in proceedings, for which we requested payment of an Issue Fund grant or Preauthorized Matching Fund. CUB provides docket-specific expenditures to the Commission with each request for payment, and the attached table summarizes the authorized and received payments in each docket.

Respectfully Submitted,

Bel Jula

April 1, 2022

Executive Director

Oregon Citizens' Utility Board

In the Matter Of	Date of Notice of Intent	Date of Request or Budget Order	Approved Budget	Payment Order	Payment Received	Release Remaining
PAC MSP	N/A	20-237	\$45,000.00			NA
AWEC	2/4/2020	20-049	\$25,000.00	Partial Payment Order 20-452	\$15,924.00	No
Avista 2021 IRP	4/13/2021	21-151	\$15,000.00	Final Payment 21-426	\$8,050.00	Yes
Idaho Power - 2021 APCU	11/9/2020	21-248	\$18,000.00	Final Payment Order 21-282	\$13,507.00	Yes
PAC - 2022 TAM	4/7/2021	21-114	\$25,000.00	Patrial Payment Order 20-853	\$20,853.00	
		21-435	\$55,000.00	Final Payment Order 21-479	\$27,267.00	Yes
PGE - APCU	4/7/2021	21-115	\$20,000.00	Final Payment Order 21-396	\$19,135.00	Yes
PGE - GRC	7/14/2021	21-249	\$41,250.00	Partial Payment Order 21-479	\$27,267.00	No
		22-027	\$91,250.00			
PGE - Depreciation	4/13/2021	21-262	\$10,000.00	Final Payment Order 21-428	\$10,000.00	Yes
PUC - Natural Gas Investigation	10/18/2021	21-424	\$30,000.00			N/A
PUC - Transportation Electrification	7/26/2021	21-250	\$20,000.00			N/A
PAC 2021 IRP	9/2/2021	21-427	\$8,000.00	Final Payment Order 21-427	\$8,000.00	Yes
NWN PGA	9/7/2021	21-423	\$5,000.00	Final Payment Order 21-480	\$5,000.00	Yes
PAC Decommissioning	10/20/2021	21-425	\$5,000,00			N/A
	PAC MSP AWEC Avista 2021 IRP Idaho Power - 2021 APCU PAC - 2022 TAM PGE - APCU PGE - GRC PGE - Depreciation PUC - Natural Gas Investigation PUC - Transportation Electrification PAC 2021 IRP NWN PGA	PAC MSP N/A AWEC 2/4/2020 Avista 2021 IRP 4/13/2021 Idaho Power - 2021 APCU 11/9/2020 PAC - 2022 TAM 4/7/2021 PGE - APCU 4/7/2021 PGE - GRC 7/14/2021 PGE - Depreciation 4/13/2021 PUC - Natural Gas Investigation 10/18/2021 PUC - Transportation Electrification 7/26/2021 PAC 2021 IRP 9/2/2021	PAC MSP N/A 20-237 AWEC 2/4/2020 20-049 Avista 2021 IRP 4/13/2021 21-151 Idaho Power - 2021 APCU 11/9/2020 21-248 PAC - 2022 TAM 4/7/2021 21-114 PGE - APCU 4/7/2021 21-115 PGE - GRC 7/14/2021 21-249 PGE - Depreciation 4/13/2021 21-262 PUC - Natural Gas Investigation 10/18/2021 21-250 PUC - Transportation Electrification 7/26/2021 21-250 PAC 2021 IRP 9/2/2021 21-427 NWN PGA 9/7/2021 21-423	PAC MSP N/A 20-237 \$45,000.00 AWEC 2/4/2020 20-049 \$25,000.00 Avista 2021 IRP 4/13/2021 21-151 \$15,000.00 Idaho Power - 2021 APCU 11/9/2020 21-248 \$18,000.00 PAC - 2022 TAM 4/7/2021 21-114 \$25,000.00 PGE - APCU 4/7/2021 21-115 \$20,000.00 PGE - GRC 7/14/2021 21-249 \$41,250.00 PGE - Depreciation 4/13/2021 21-249 \$41,250.00 PGE - Depreciation 10/18/2021 21-262 \$10,000.00 PUC - Natural Gas Investigation 10/18/2021 21-250 \$20,000.00 PUC - Transportation Electrification 7/26/2021 21-250 \$20,000.00 PAC 2021 IRP 9/2/2021 21-427 \$8,000.00 NWN PGA 9/7/2021 21-423 \$5,000.00	PAC MSP	PAC NSP

Docket	In the Matter Of	Date of Notice of Intent	Date of Request or Budget Order	Approved Budget	Payment Order	Payment Received	Release Remaining
2022 Dockets							
UG 433	Avista GRC	1/6/2022	22-003	\$50,000.00			N/A
UG 435	NWN GRC	2/2/2022	22-026	\$80,000.00			N/A
UE 399	PAC GRC	3/18/2022					N/A
UE 400	PAC 2023 TAM	3/18/2022					N/A
UE 401	Idaho Power Power Cost	3/18/2022					N/A