## **BEFORE THE PUBLIC UTILITY COMMISSION**

## **OF OREGON**

**UE 352** 

In the Matter of	)
PACIFICORP, dba PACIFIC POWER,	)
2019 Renewable Adjustment Clause.	)
	)

OREGON CITIZENS' UTILITY BOARD'S MOTION TO DESIGNATE AS ELIGIBLE FOR ISSUE FUNDS

Pursuant to Section 1(c)(v) of the Fourth Amended Intervenor Funding Agreement ("IFA"), approved on January 17, 2018 by the Oregon Public Utility Commission ("Commission") in Order No. 18-017, and the Chief Administrative Law Judge's February 12, 2018 Ruling in Docket No. UM 1909, the Oregon Citizens' Utility Board ("CUB") files this motion to designate the above-referenced docket as eligible for an Issue Fund Grant. The Alliance of Western Energy Consumers ("AWEC") has authorized CUB to represent that it supports this motion.

Section 1(c)(v) of the IFA defines "Eligible Proceeding for Issue Funds" as, among other things, a proceeding "so designated by the Commission that directly affects one or more of the Participating Utilities and is anticipated to have a substantial impact on utility rates or service, [or] a significant impact on utility customers or the operations of the utility . . . ." PacifiCorp is one of the "Participating Utilities" in the IFA.<sup>1</sup> Further, this proceeding is anticipated to have a substantial impact on utility rates and on PacifiCorp's customers. In its application, PacifiCorp

<sup>&</sup>lt;sup>1</sup> IFA § 1(n).

requests a rate increase of \$16.0 million or 1.2 percent, on a net basis, effective October 1, 2019, followed by an incremental increase of \$20.8 million or 1.6 percent, on a net basis, effective December 1, 2019. A total \$36.8 million increase resulting from this filing constitutes a substantial impact on utility rates or service. This filing also raises significant and complex policy issues related to ratemaking treatment and recovery of capital assets that PacifiCorp seeks contemporaneously with the construction of the projects in question.

Therefore, for the foregoing reasons, CUB respectfully moves the Commission to designate this proceeding as an "Eligible Proceeding for Issue Funds" under the IFA.

Dated this 15<sup>th</sup> day of January, 2019

Respectfully submitted,

/s/ Michael P. Goetz

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