



LISA D. NORDSTROM
Lead Counsel
lnordstrom@idahopower.com

July 30, 2020

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301

Re: Docket UM 1621(8)
In the Matter of Idaho Power Company's Request for Authorization for
Deferral of Costs Associated with Intervenor Funding Grants

Attention Filing Center:

Enclosed for filing in Docket No. UM 1621(8) is an electronic copy of Idaho Power Company's Application for Reauthorization of Deferred Accounting. The Notice of Application for Reauthorization of Deferred Costs Associated with Intervenor Funding Grants is attached to the Application as Attachment A. The Application and Notice have been served on the parties in Docket No. UM 1621 and Idaho Power Company's last general rate case.

If you have any questions, please do not hesitate to contact me or Senior Regulatory Analyst Courtney Waites at (208) 388-5612.

Very truly yours,

A handwritten signature in black ink that reads 'Lisa D. Nordstrom'.

Lisa D. Nordstrom
OSB No. 97352

LDN/sh

Enclosures

1 **BEFORE THE PUBLIC UTILITY COMMISSION**

2 **OF OREGON**

3 **UM 1621(8)**

4
5 In the Matter of Idaho Power Company's
6 Application for Deferred Accounting of Costs
7 Associated with Intervenor Funding Grants

**APPLICATION FOR
REAUTHORIZATION OF
DEFERRED ACCOUNTING**

8
9 **I. INTRODUCTION**

10 Pursuant to ORS 757.259, and OAR 860-027-0300, Idaho Power Company ("Idaho
11 Power" or "Company") applies to the Public Utility Commission of Oregon ("Commission")
12 for an order reauthorizing the Company to defer costs associated with intervenor funding
13 grants pursuant to ORS 757.072 and ORS 757.259(3). Idaho Power requests
14 reauthorization of the deferral of all costs incurred beginning August 1, 2020, and ending
15 July 31, 2021. In support of this Application, Idaho Power states:

- 16 1. Idaho Power is a public utility in the state of Oregon and its rates, services,
17 and accounting practices are subject to the regulation of the Commission.
18 2. This Application is filed pursuant to ORS 757.259(3), which allows for deferral
19 of amounts provided as financial assistance under an agreement entered into
20 under ORS 757.072 upon request of the public utility.
21 3. Communications regarding this Application should be addressed to:

22 Lisa D. Nordstrom
23 Idaho Power Company
24 P.O. Box 70
25 Boise, Idaho 83707
26 lnordstrom@idahopower.com

Regulatory Dockets
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707
dockets@idahopower.com

1 **II. DEFERRAL HISTORY**

2 On February 5, 2016, the Commission issued Order No. 16-028 in UM 1757
3 approving the Intervenor Funding Agreement (“Agreement”) between Idaho Power and the
4 Citizens’ Utility Board of Oregon (“CUB”) dated January 1, 2016. Per the terms of the
5 Agreement, it is effective from January 26, 2016, until December 31, 2020. The Agreement
6 sets forth the amount of funding available to CUB, the procedures for budget submittals and
7 funding requests by CUB, Commission approval of budget submittals and funding requests,
8 and payment of the grants by Idaho Power. The Agreement provides that the Commission
9 shall allow Idaho Power to recover all amounts paid under the Agreement and provides for
10 amortization of amounts deferred under the Agreement.

11 Idaho Power filed an application with the Commission in Docket No. UM 1507 for
12 authorization to defer costs associated with intervenor funding grants for the 12-month
13 period beginning October 20, 2010. The Commission approved the request in Order No.
14 10-483. The table below summarizes Idaho Power’s deferred accounting requests
15 associated with intervenor funding grant costs since a funding agreement has been in place.

16

Filing Date	Deferral Period	Order No.	Approval Date
09/28/10		10-396*	10/13/10
10/20/10	10/20/10 – 10/19/11	10-483	12/20/10
07/30/12	10/20/11 – 08/01/13	12-378	10/08/12
07/30/13	08/01/13 – 07/31/14	13-323	09/03/13
07/24/14	08/01/14 – 07/31/15	14-298	09/02/14
07/31/15	08/01/15 – 07/31/16	15-371	11/17/15
07/28/16	08/01/16 – 07/31/17	16-365	09/27/16
07/25/17	08/01/17 – 07/31/18	17-315	08/23/17
07/26/18	08/01/18 – 07/31/19	18-377	10/11/18
07/26/19	08/01/19 – 07/31/20	19-314	09/26/19

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24 *The first CUB Intervenor Funding Agreement was approved in UM 1504.

25 Pursuant to the Commission Orders listed above, Idaho Power respectfully requests
26 an order reauthorizing the deferral for later ratemaking treatment of all payments made by

1 Idaho Power to CUB between August 1, 2020, and July 31, 2021. Although the current
2 Agreement expires on December 31, 2020, the Company anticipates an extension of the
3 Agreement or the execution of a new agreement with equivalent terms that would allow
4 Idaho Power to recover all amounts paid under the agreement and provides for amortization
5 of amounts deferred under the agreement. Should the parties not extend the existing
6 Agreement or execute a new agreement, the Company requests approval to defer those
7 CUB intervenor funding amounts approved by the Commission during the January 1, 2021,
8 and July 31, 2021, time period, in addition to those intervenor funding amounts approved
9 under the Agreement.

10 **III. OREGON ADMINISTRATIVE RULE 860-027-0300(3) REQUIREMENTS**

11 The following information is provided pursuant to OAR 860-027-0300(3):

12 **A. Description of Utility Expense or Revenue**

13 For the 12-month period of August 1, 2020, through July 31, 2021, Idaho Power
14 seeks reauthorization from the Commission to continue accruing, for future amortization as
15 set forth in the Agreement between Idaho Power and CUB, costs associated with providing
16 intervenor funding pursuant to ORS 757.072 and Order No. 16-028 to the CUB Fund and
17 the Issue Fund.

18 **B. Reasons for Deferral**

19 **1. Statutory Authority**

20 ORS 757.072 authorizes the Commission to approve an agreement for intervenor
21 funding between an energy utility and a customer organization that represents broad
22 customer interests. ORS 757.259(3) provides that:

23 Upon request of the public utility, the commission by order
24 shall allow deferral of amounts provided as financial
25 assistance under an agreement entered into under ORS
26 757.072 for later incorporation in rates.

1 Amounts deferred under ORS 757.259(3) are not subject to the amortization caps or
2 earnings review set forth in Subsections 5, 6, 7, 8, and 10 of ORS 757.259.

3 **2. Commission Approval of the Intervenor Funding Agreement**

4 Idaho Power will continue to incur intervenor funding expenses pursuant to the
5 Agreement approved by Commission Order No. 16-028 and anticipates incurring CUB
6 intervenor funding expenses under a similar arrangement in the future. Idaho Power wishes
7 to continue to use the deferral mechanism as approved. Idaho Power requests that the
8 deferral continue and that the additional amounts the Company is required to pay to CUB
9 during the period of August 1, 2020, through July 31, 2021, be treated similarly.

10 **C. Proposed Accounting**

11 Idaho Power proposes to record payment of intervenor funding grants in Federal
12 Energy Regulatory Commission ("FERC") Account 182.3, Other Regulatory Assets. In the
13 absence of a deferred accounting order from the Commission, Idaho Power would continue
14 to record costs associated with the intervenor funding expenses to FERC Account 928.3,
15 Regulatory Commission Expenses.

16 **D. Estimate of Amounts Subject to Deferral**

17 The Company anticipates the maximum amount deferred during each calendar year
18 will be \$63,000—consisting of \$31,500 for the CUB Fund and \$31,500 for the Issue Fund
19 pursuant to Section 4.2 of the Agreement, plus any rollover amounts permitted by Section
20 4.3 of the Agreement. Deferred amounts will accrue interest at Idaho Power's authorized
21 rate of return. Based on this estimate for the August 1, 2020, through July 31, 2021, time
22 period and those expenses deferred since amortization of prior deferred intervenor funding
23 amounts began on June 1, 2020, Idaho Power estimates the total of the account balances
24 associated with intervenor funding paid to CUB will be approximately \$67,400. The
25 Agreement permits CUB to request grants from the funds at any time during the calendar
26 year, though the deferral period runs August 1 to July 31. Amounts will be debited to the

1 deferral account as the funds are actually disbursed. Pursuant to the terms of the
2 Agreement, the CUB Fund Grants will be charged to and paid for by the residential customer
3 class.

4 **E. Notice**

5 A copy of the Notice of Application for Reauthorization of Deferred Costs Associated
6 with Intervenor Funding Grants is attached to this Application pursuant to OAR 860-027-
7 0300 as Attachment A. The Application and Notice will be served on the parties in Docket
8 No. UM 1621 and Idaho Power's last general rate case.

9 **IV. OREGON ADMINISTRATIVE RULE 860-027-0300(4) REQUIREMENTS**

10 **A. Entries in the Deferred Account as of June 30, 2020**

11 Effective June 1, 2020, with Order No. 20-176, the Commission approved amortization
12 of \$37,383 in CUB intervenor funding amounts, resulting in a balance of \$4,361 in the
13 deferral account. Attached to this Application as Attachment B is a description and
14 explanation of the entries in this deferred account as of June 30, 2020.

15 **B. Reason for Continuation of Deferred Accounting**

16 Idaho Power is seeking approval to continue the intervenor funding deferral as
17 described in Section II above.

18 **V. SUMMARY OF FILING CONDITIONS**

19 The following is information related to future amortization:

20 **A. Earnings Review**

21 None required. Amounts deferred under ORS 757.259 are not subject to the
22 amortization caps or earnings review set forth in Subsections 5, 6, 7, 8, and 10 of ORS
23 757.259.

24 **B. Prudence**

25 A prudence review will be performed prior to amortization.

26

1 C. Sharing (Percents)

2 None applicable.

3 D. Rate Spread/Rate Design

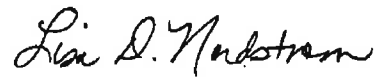
4 Please see Section III.D above.

5 **VI. CONCLUSION**

6 Idaho Power respectfully requests that, consistent with ORS 757.259(3) and Order
7 No. 16-028, the Commission authorize the Company to record and defer additional
8 intervenor funding grants incurred by the Company beginning August 1, 2020, and ending
9 July 31, 2021.

10 DATED: July 30, 2020.

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LISA D. NORDSTROM
Attorney for Idaho Power Company

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UM 1621(8)
APPLICATION FOR REAUTHORIZATION OF
DEFERRED ACCOUNTING

ATTACHMENT A

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UM 1621(8)**

4 In the Matter of Idaho Power Company's
5 Application for Deferred Accounting of Costs
6 Associated with Intervenor Funding Grants

**NOTICE OF APPLICATION FOR
REAUTHORIZATION OF DEFERRED
COSTS ASSOCIATED WITH
INTERVENOR FUNDING GRANTS**

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8 On July 30, 2020, Idaho Power Company ("Idaho Power") filed an application with
9 the Public Utility Commission of Oregon ("Commission") for an order authorizing deferral of
10 intervenor funding grants pursuant to ORS 757.259(3), ORS 757.072, and Order No. 16-028.

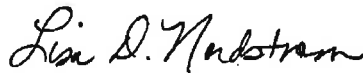
11 Approval of Idaho Power's Application will not authorize a change in Idaho Power's
12 rates but will permit the Commission to consider allowing such deferred amounts in rates in
13 a subsequent proceeding.

14 Idaho Power's Application will be posted on the Commission website for persons
15 who wish to obtain a copy or they may contact the following:

16 Lisa D. Nordstrom
17 Idaho Power Company
18 P.O. Box 70
19 Boise, Idaho 83707
20 lnordstrom@idahopower.com

21 Any person who wishes to submit written comments to the Commission on Idaho
22 Power's Application must do so no later than August 27, 2020.

23 DATED: July 30, 2020.

24 

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LISA D. NORDSTROM
26 Attorney for Idaho Power Company

UM 1621(8)
**APPLICATION FOR REAUTHORIZATION OF
DEFERRED ACCOUNTING**

ATTACHMENT B

INTERVENOR FUNDING DEFERRED ACCOUNT MONTHLY ENTRIES

Account	DB2DATE	DISTDESC	Descr	TOTAMT
182385	12/31/2015	BALANCE OF INT FUNDING TO NEW	INT FUNDING TO NEW ACCT	5,472.81
182385	2/29/2016	CUB FUNDING INTEREST	CARRYING CHARGES	35.38
182385	2/29/2016	CUB FUND GRANT	CUB FUND GRANT	31,500.00
182385	3/31/2016	CUB FUNDING INTEREST	CARRYING CHARGES	137.30
182385	4/30/2016	CUB FUNDING INTEREST	CARRYING CHARGES	239.67
182385	5/31/2016	CUB FUNDING INTEREST	CARRYING CHARGES	240.89
182385	6/30/2016	CUB FUNDING INTEREST	CARRYING CHARGES	242.44
182385	7/31/2016	CUB FUNDING INTEREST	CARRYING CHARGES	244.00
182385	8/31/2016	CUB FUNDING INTEREST	CARRYING CHARGES	245.58
182385	8/31/2016	CUB ISSUE FUND 16-281	CARRYING CHARGES	1,944.00
182385	8/31/2016	CUB ISSUE FUND 16-284	CARRYING CHARGES	30,000.00
182385	8/31/2016	CUB ISSUE FUND 16-285	CARRYING CHARGES	7,784.00
182385	9/30/2016	CUB FUNDING INTEREST	CARRYING CHARGES	375.56
182385	10/31/2016	CUB FUNDING INTEREST	CARRYING CHARGES	505.98
182385	11/30/2016	CUB FUNDING INTEREST	CARRYING CHARGES	508.82
182385	12/31/2016	CUB FUNDING INTEREST	CARRYING CHARGES	512.10
182385	1/31/2017	CUB FUNDING INTEREST	CARRYING CHARGES	515.40
182385	1/31/2017	CUB FUND GRANT 17-006	CUB FUND GRANT	31,500.00
182385	2/28/2017	CUB FUNDING INTEREST	CARRYING CHARGES	620.54
182385	3/31/2017	CUB FUNDING INTEREST	CARRYING CHARGES	726.02
182385	4/30/2017	CUB FUNDING INTEREST	CARRYING CHARGES	730.37
182385	5/31/2017	CUB FUNDING INTEREST	CARRYING CHARGES	735.08
182385	6/30/2017	CUB FUNDING INTEREST	CARRYING CHARGES	739.81
182385	6/30/2017	CUB FUND FOR AMORTIZATION	Rate Related Amortization	(112,003.93)
182385	7/31/2017	CUB FUNDING INTEREST	CARRYING CHARGES	382.57
182385	7/31/2017	CUB ISSUE FUND 17-278	Carrying Charges	4,000.00
182385	8/31/2017	CUB FUNDING INTEREST	CARRYING CHARGES	37.12
182385	8/31/2017	CUB ISSUE FUND 17-294	CARRYING CHARGES	4,400.00
182385	9/30/2017	CUB ISSUE FUND 17-294	CARRYING CHARGES	40.00
182385	9/30/2017	CUB FUNDING INTEREST	CARRYING CHARGES	65.63
182385	9/30/2017	CUB FUND GRANT 17-353	Carrying Charges	4,003.00
182385	10/31/2017	CUB FUND 17-425	Carrying Charges	591.00
182385	10/31/2017	CUB FUNDING INTEREST	CARRYING CHARGES	93.25
182385	11/30/2017	CUB FUNDING INTEREST	CARRYING CHARGES	108.74
182385	11/30/2017	CUB INT FND 17-430	CARRYING CHARGES	2,774.58
182385	11/30/2017	CUB INT FND 17-468	CARRYING CHARGES	9,295.00
182385	12/31/2017	CUB FUNDING INTEREST	CARRYING CHARGES	150.31
182385	1/31/2018	CUB FUNDING INTEREST	CARRYING CHARGES	190.16
182385	1/31/2018	CUB FUND 18-011	CARRYING CHARGES	31,500.00
182385	2/28/2018	CUB FUNDING INTEREST	CARRYING CHARGES	293.07
182385	2/28/2018	CUB FUND 18-048	CARRYING CHARGES	3,000.00
182385	3/31/2018	CUB FUNDING INTEREST	CARRYING CHARGES	406.14
182385	4/30/2018	CUB FUNDING INTEREST	CARRYING CHARGES	418.10
182385	5/31/2018	CUB FUNDING INTEREST	CARRYING CHARGES	420.76
182385	6/30/2018	CUB FUNDING INTEREST	CARRYING CHARGES	423.47
182385	6/30/2018	CUB FUND 18-218	CARRYING CHARGES	3,920.00
182385	6/30/2018	CUB FUND 18-211	CARRYING CHARGES	4,510.00
182385	6/30/2018	CUB FUND FOR AMORTIZATION	Rate Related Amortizations	(61,183.18)
182385	7/31/2018	CUB FUNDING INTEREST	CARRYING CHARGES	255.70
182385	8/31/2018	CUB FUNDING INTEREST	CARRYING CHARGES	87.39
182385	8/31/2018	CUB FUND 18-287	CARRYING CHARGES	2,000.00
182385	9/30/2018	CUB FUNDING INTEREST	CARRYING CHARGES	94.96
182385	10/31/2018	CUB FUNDING INTEREST	CARRYING CHARGES	102.02
182385	11/30/2018	CUB FUNDING INTEREST	CARRYING CHARGES	102.65
182385	11/30/2018	CUB FUNDING 18-406	CARRYING CHARGES	457.00
182385	11/30/2018	CUB FUNDING 18-436	CARRYING CHARGES	1,610.00
182385	12/31/2018	CUB FUNDING INTEREST	CARRYING CHARGES	110.00
182385	1/31/2019	CUB FUNDING INTEREST	CARRYING CHARGES	117.37
182385	1/31/2019	CUB FUND GRANT 19-003	CARRYING CHARGES	31,500.00
182385	2/28/2019	CUB FUNDING INTEREST	CARRYING CHARGES	219.91
182385	3/31/2019	CUB FUNDING INTEREST	CARRYING CHARGES	322.81
182385	4/30/2019	CUB FUNDING INTEREST	CARRYING CHARGES	324.57
182385	5/31/2019	CUB FUNDING INTEREST	CARRYING CHARGES	326.66
182385	5/31/2019	CUB ISSUE FUND 19-143	CARRYING CHARGES	2,000.00
182385	6/30/2019	CUB TXFR TO AMORT	Rate Related Amortization	(49,828.63)
182385	6/30/2019	CUB FUNDING INTEREST	CARRYING CHARGES	335.23
182385	7/31/2019	CUB FUNDING INTEREST	CARRYING CHARGES	182.78
182385	8/31/2019	CUB FUNDING INTEREST	CARRYING CHARGES	23.40
182385	1/31/2020	CUB FUNDING INTEREST	CARRYING CHARGES	24.70
182385	1/31/2020	CUB FUND GRANT 20-005	CARRYING CHARGES	31,500.00
182385	2/29/2020	CUB FUNDING INTEREST	CARRYING CHARGES	126.66
182385	3/31/2020	CUB FUNDING INTEREST	CARRYING CHARGES	228.96
182385	4/30/2020	CUB FUNDING INTEREST	CARRYING CHARGES	230.11
182385	5/31/2020	CUB FUNDING INTEREST	CARRYING CHARGES	231.60
182385	5/31/2020	CORRECT ACCT	CARRYING CHARGES	3,300.00
182385	6/30/2020	CUB FUNDING INTEREST	CARRYING CHARGES	243.76
182385	6/30/2020	CUB TXFR	Rate Related Amortization	(35,357.27)
182385	12/31/2019	CUB FUNDING INTEREST	CARRYING CHARGES	24.54
182385	9/30/2019	CUB FUNDING INTEREST	CARRYING CHARGES	24.07
182385	10/31/2019	CUB FUNDING INTEREST	CARRYING CHARGES	24.22
182385	11/30/2019	CUB FUNDING INTEREST	CARRYING CHARGES	24.38
				4,361.09

1 **CERTIFICATE OF SERVICE**

2 **UM 1621(8)**

3
4 I hereby certify that on July 30, 2020, I served a true and correct copy of Idaho Power Company's
5 Intervenor Funding Deferral Application on the parties in Docket Nos. UM 1621 and UE 233 by e-
6 mail to said person(s) as indicated below.

7 OPUC Dockets
Citizens' Utility Board of Oregon
8 dockets@orecioncub.org

Robert Jenks
Citizens' Utility Board of Oregon
bob@oregoncub.org

9 Lisa F. Rackner
McDowell Rackner & Gibson PC
10 dockets@mcd-law.com

Stephanie S. Andrus
Department of Justice
Business Activities Section
stephanie.andrus@state.or.us

11 Dr. Don Reading
12 dreading@mindspring.com

Kathy Zarate
Public Utility Commission of Oregon
kathy.zarate@state.or.us

13 Erik Colville
Public Utility Commission of Oregon
14 erik.colville@state.or.us

Gregory M. Adams
Richardson Adams, PLLC
greg@richardsonadams.com

15 Peter J. Richardson
Richardson Adams, PLLC
16 peter@richardsonadams.com

Joshua D. Johnson
Attorney at Law
jdj@racinelaw.net

17 Renewable Northwest Project
18 dockets@renewablenw.org

Anthony J. Yankel
Utility Net, Inc.
tony@yankel.net

19 Randy Dahlgren
Portland General Electric Company
20 pqe.opuc.filings@pqn.com

Douglas C. Tingey
Portland General Electric Company
doug@tingey@pqn.com

21 Irion A. Sanger
Davison Van Cleve, PC
22 ias@sanger-law.com

Wendy Gerlitz
NW Energy Coalition
wendy@nwenergy.org

23 Etta Lockey
Pacific Power
24 etta.lockey@pacificcorp.com

Sarah Link
Pacific Power
sarah.link@pacificcorp.com


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Oregon Dockets
PacifiCorp, d/b/a Pacific Power
oregondockets@pacificcorp.com

Donald W. Schoenbeck
Regulatory & Cogeneration Services, Inc.
dws@r-c-s-inc.com

John W. Stephens
Esler Stephens & Buckley
stephens@eslerstephens.com
ortez@eslerstephens.com

DATED: July 30, 2020


Stephanie L. Buckner,
Executive Assistant