

1 **BEFORE THE PUBLIC UTILITY COMMISSION**

2 **OF OREGON**

3 **UM 1621(7)**

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**

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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, 2019, and ending  
15 July 31, 2020. 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, and  
17 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  
Boise, Idaho 83707  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)

Regulatory Dockets  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707  
[dockets@idahopower.com](mailto: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.

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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

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

24 Pursuant to the Commission Orders listed above, Idaho Power respectfully requests  
25 an order reauthorizing the deferral for later ratemaking treatment of all payments made by  
26 Idaho Power to CUB between August 1, 2019, and July 31, 2020.

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

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

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

4           For the 12-month period of August 1, 2019, through July 31, 2020, Idaho Power  
5 seeks reauthorization from the Commission to continue accruing, for future amortization as  
6 set forth in the Agreement between Idaho Power and CUB, costs associated with providing  
7 intervenor funding pursuant to ORS 757.072 and Order No. 16-028 to the CUB Fund and  
8 the Issue Fund.

9   **B.   Reasons for Deferral**

10          **1.    Statutory Authority**

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

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

17           Amounts deferred under this provision are not subject to the amortization caps or earnings  
18 review set forth in Subsections 5, 6, 7, 8, and 10 of ORS 757.259.

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

20           Idaho Power will continue to incur intervenor funding expenses until December 31,  
21 2020, pursuant to the Agreement approved by Commission Order No. 16-028. Idaho Power  
22 wishes to continue to use the deferral mechanism as approved. Idaho Power requests that  
23 the deferral continue and that the additional amounts the Company is required to pay to  
24 CUB during the period of August 1, 2019, through July 31, 2020, be treated similarly.

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1 **C. Proposed Accounting**

2 Idaho Power proposes to record payment of intervenor funding grants in Federal  
3 Energy Regulatory Commission (“FERC”) Account 182.3, Other Regulatory Assets. In the  
4 absence of a deferred accounting order from the Commission, Idaho Power would continue  
5 to record costs associated with the intervenor funding expenses to FERC Account 928.3,  
6 Regulatory Commission Expenses.

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

8 The Company anticipates the maximum amount deferred during each calendar year  
9 will be \$63,000—consisting of \$31,500 for the CUB Fund and \$31,500 for the Issue Fund  
10 pursuant to Section 4.2 of the Agreement, plus any rollover amounts permitted by Section  
11 4.3 of the Agreement. Deferred amounts will accrue interest at Idaho Power’s authorized  
12 rate of return. Based on this estimate for the August 1, 2019, through July 31, 2020, time  
13 period and those expenses deferred since amortization of prior deferred intervenor funding  
14 amounts began on June 1, 2019, Idaho Power estimates the total of the account balances  
15 associated with intervenor funding paid to CUB will be approximately \$66,500.

16 The Agreement permits CUB to request grants from the funds at any time during the  
17 calendar year, though the deferral period runs August 1 to July 31. Amounts will be debited  
18 to the deferral account as the funds are actually disbursed. Balances in the CUB Fund and  
19 the Issue Fund may rollover into the following year if CUB does not use the entire amount  
20 available, and the CUB Fund permits CUB to request advances from future-year funds.  
21 Pursuant to the terms of the Agreement, the CUB Fund Grants will be charged to and paid  
22 for by the residential customer class.

23 **E. Notice**

24 A copy of the Notice of Application for Reauthorization of Deferred Costs Associated  
25 with Intervenor Funding Grants is attached to this Application pursuant to OAR 860-027-  
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1 0300 as Attachment A. The Application and Notice will be served on the parties in Docket  
2 No. UM 1621 and Idaho Power's last general rate case.

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

4 **A. Entries in the Deferred Account as of June 30, 2019**

5 Effective June 1, 2019 with Order No. 19-193, the Commission approved  
6 amortization of \$52,240 in CUB intervenor funding amounts, resulting in a balance of \$3,529  
7 in the deferral account. Attached to this Application as Attachment B is a description and  
8 explanation of the entries in this deferred account as of June 30, 2019.

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

10 Idaho Power is seeking approval to continue the intervenor funding deferral pursuant  
11 to Commission Order No. 16-028 as described in Section II above.

12 **V. SUMMARY OF FILING CONDITIONS**

13 The following is information related to future amortization:

14 **A. Earnings Review**

15 None required. Amounts deferred under ORS 757.259 are not subject to the  
16 amortization caps or earnings review set forth in Subsections 5, 6, 7, 8, and 10 of ORS  
17 757.259.

18 **B. Prudence**

19 A prudence review will be performed prior to amortization.

20 **C. Sharing (Percents)**

21 None applicable.

22 **D. Rate Spread/Rate Design**

23 Please see Section III.D above.

24 **VI. CONCLUSION**

25 Idaho Power respectfully requests that, consistent with ORS 757.259(3) and Order  
26 No. 16-028, the Commission authorize the Company to record and defer additional

1 intervenor funding grants incurred by the Company pursuant to the Agreement beginning  
2 August 1, 2019, and ending July 31, 2020.

3 DATED: July 26, 2019.

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5 LISA D. NORDSTROM  
6 Attorney for Idaho Power Company

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**Attachment A**

**Notice of Application for Reauthorization  
of Deferred Costs Associated with  
Intervenor Funding Grants**

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1621(7)**

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

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

On July 26, 2019, Idaho Power Company ("Idaho Power") filed an application with the Public Utility Commission of Oregon ("Commission") for an order authorizing deferral of intervenor funding grants pursuant to ORS 757.259(3), ORS 757.072, and Order No. 16-028.

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

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

Lisa D. Nordstrom  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)

Any person who wishes to submit written comments to the Commission on Idaho Power's Application must do so no later than August 25, 2019.

DATED: July 26, 2019.

  
LISA D. NORDSTROM  
Attorney for Idaho Power Company



**Attachment B**

**Funding Grants Monthly Entries**

**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	CARRYING CHARGES	(49,828.63)
182385	6/30/2019	CUB FUNDING INTEREST	CARRYING CHARGES	335.23
				<u>3,529.18</u>