

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 374

In the Matter of)	
)	SECOND PROPOSED BUDGET
PACIFICORP, d.b.a. PACIFIC POWER)	OF SMALL BUSINESS
)	UTILITY ADVOCATES
Request for General Rate Revision)	
_____)	

1. INTRODUCTION

Pursuant to the Fourth Amended and Restated Intervenor Funding Agreement approved in Order 18-017 (“IFA”), Small Business Utility Advocates (“SBUA”) submits this Proposed Budget which is required to receive an issue fund grant¹ to assist SBUA in implementing the Partial Stipulation approved in this docket on December 18, 2020 in Order 20-473 (“Stipulation”). The Oregon Public Utility Commission (“Commission”) granted the Petition of SBUA for Case Certification on June 10, 2020 in Order 20-187.

According to the Stipulation, PacifiCorp agreed to do additional outreach to small commercial customers on the availability of applicable pilots. PacifiCorp additionally agrees to do the following with respect to small business customers:

- a. Create a marketing, education and outreach (“ME&O”) plan for Schedule 23 customers;
- b. Work collaboratively with SBUA regarding the ME&O plan for these customers, particularly as it relates to enrollment in Schedules 23/210; and

¹ Section 6.3 Fourth Amended and Restated Intervenor Funding Agreement, approved by Order 18-017 (“Agreement”).

c. By October 2021, the Company will consult with SBUA prior to providing an informational report on data obtained regarding Schedule 23 customers, and provide the Stipulating Parties an informational report exploring potential alternate rate design changes for Schedule 23 customers. The Company commits to review the data and evaluate rate design and pricing options that may be proposed in a future general rate case.²

SBUA did consult with PacifiCorp with regard to a work plan on or about January 15-19, 2021, and did provide this Proposed Budget including Exhibit A to PacifiCorp on or about January 30, 2021. PacifiCorp stated through counsel on January 19, 2021, the last communication SBUA has received, that it was beginning internal discussions in the next week or so and hopes to be ready for a meeting in late February.

2. REQUIREMENTS FOR AN ISSUE FUND GRANT PROPOSED BUDGET

The Proposed Budget must include: (a) a statement of work to be performed by the applicant for which the applicant is seeking an Issue Fund Grant; (b) a description of the areas to be investigated by the intervenor; (c) a description of the particular customer class or classes that will benefit from the intervenor's participation; (d) identification of the specific account or accounts from which the intervenor is seeking an Issue Fund Grant and an estimate of the amount of available funds in that account; (e) a budget showing estimated attorney fees, which may include the cost for appropriate support staff and operational support; (f) a budget showing estimated consultant fees and expert witness fees, which may include the cost for appropriate support staff and operational support; and (g) a representation that the intervenor will use matching

² UE 374 PacifiCorp d/b/a Pacific Power Request for a General Rate Revision, Order 20-473 Appendix A, p7.

funds in the form of either in-house resources or outside funding to account for or pay at least 20% of the Eligible Expenses for the work to be performed for which the intervenor is seeking an Issue Fund Grant.³

(a) A statement of work to be performed by the applicant for which the applicant is seeking an Issue Fund Grant

SBUA work will focus on implementing the provisions of the Stipulation applying specifically to PacifiCorp's Schedule 23 customers in Oregon. SBUA does contemplate planning with the Company and has approached the Company for this purpose, however, for overall planning implementation and considerations of staffing and funding within the framework of the IFA, SBUA proposes here a scope to inform the Commission promptly for the purpose of filing this Proposed Budget. There are two main parts to the Company's work specifically regarding Schedule 23 General Service customers that are the focus of SBUA work: 1) development by the Company, in consultation with SBUA, of a marketing, education and outreach plan, and 2) review and consult on the report the Company is required to file regarding the AMI produced data regarding these customers including recommended rate structures appropriate for this customer class for a future rate case.

With regard to assisting with development of a Marketing Education and Outreach ("ME&O") plan for small commercial customers, SBUA respectfully suggests tasks to include best practices with regard to outreach plan to small commercial customers, and work collaboratively with the Company regarding the ME&O plan for these customers, particularly as it relates to enrollment in Schedules 23/210. Activities within the scope include, not exclusively engaging

³ Id.

outreach consultant utilizing SBUA's technical consultant who already has background in this docket, Zoom meetings with SBUA members, meetings with the Company's marketing and commercial customer engagement staff, time reviewing messages on Schedule 23 customers' bills, design of user friendly section on PAC's website, sample number of direct calls to Schedule 23 customers, among other activities, and participating in meetings with the Company, and related public meetings with the Commission.

With regard to reviewing and consult on the report the Company is required to consult with SBUA prior to providing an informational report on data obtained regarding Schedule 23 customers based on Advanced Metering Infrastructure ("AMI") produced data regarding these customers. To this end, SBUA contemplated utilizing skills of its technical and legal staffing especially to review the data and meet with the Company, and perform other follow up research and analysis, with perhaps some public outreach.

Given the above scope is designed for an innovation, this aforementioned scope may be revised and SBUA would according request a revised Proposed Budget.

b) A description of the areas to be investigated by the intervenor

SBUA work will focus on the deliverables with regard to PacifiCorp and SBUA collaboration identified in the Stipulation including the following:

- 1) Create a marketing, education and outreach ("ME&O") plan for Schedule 23 customers.
- 2) Work collaboratively with SBUA regarding the ME&O plan for these customers, particularly as it relates to enrollment in Schedules 23/210 and
- 3) By October 2021, the Company will consult with SBUA prior to providing an informational report on data obtained regarding Schedule 23 customers, and provide the Stipulating

Parties an informational report exploring potential alternate rate design changes for Schedule 23 customers in a future rate case.⁴

(c) A description of the particular customer class or classes that will benefit from the intervenor's participation.

The particular customer class that would benefit from SBUA's participating in the proceeding is the small nonresidential ratepayer class, known as Schedule 23, though other small nonresidential ratepayers and other classes may also benefit.

(d) Identification of the specific account or accounts from which the intervenor is seeking an Issue Fund Grant and an estimate of the amount of available funds in that account.

The account from which SBUA seeks an Issue Fund Grant is PacifiCorp d.b.a. Pacific Power Issue Fund Grant. On January 30, 2021, an estimate of the amount of uncommitted funds in that account is approximately \$143,750, the annual Issue Fund amount per the IFA⁵ plus \$24, the approximate amount remaining in the Issue Fund grant from 2020.⁶

(e), (f), and (g) require a budget showing estimated attorney fees, which may include the cost for appropriate support staff and operational support, a budget showing estimated consultant fees and expert witness fees, which may include the cost for appropriate support staff and operational support, and a representation that the intervenor will use matching funds in the form of either in-house resources or outside funding to account for or pay at

⁴ UE 374 PacifiCorp dba Pacific Power Request for a General Rate Revision, Order 20-473 Appendix A, p7.

⁵ Order 18-017, Appendix A p2.

⁶ Intervenor Funding Summary, <https://www.oregon.gov/puc/filing-center/Pages/Intervenor-Funding.aspx> (last accessed 2.6.21).

least 20% of the Eligible Expenses for the work to be performed for which the intervenor is seeking an Issue Fund Grant.

SBUA submits the attached Exhibit A as a Budget for the Issue Fund Grant requested. While not specifically required by the Agreement, mindful of the Commission's guidance directly on point in Orders 19-133 and 19-262, SBUA did seek to consult the Hearings Division on January 23, 2021 with regard to this request and had opportunity to have questions between January 7-February 2, 2021.

3. CONCLUSION

SBUA submits the information above as its Proposed Budget to comply with the terms of the Stipulation adopted by Order in this docket.

RESPECTFULLY SUBMITTED February 9, 2021.



s/ Diane Henkels

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EXHIBIT A

SBUA Second Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	40	240	\$9600
Attorney	50	205	\$10,250
Administrator/paralegal	50	50	\$2,500
Outreach expert	50	125	\$6250
Technical Analysis Expert	80	150	\$12000
Executive Director	5	250	\$1250
<i>Other Expenses</i>			
Travel —Expert distance to			\$2000
Other			\$300
Printing and Postage			\$100
Subtotal			\$44250
20% of SBUA Funded Expenditures			\$8850
Total SBUA PacifiCorp Issue Fund Grant Proposed Request			\$35400