

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1209

In the Matter of)	
)	CUB REQUEST FOR A
MIDAMERICAN ENERGY HOLDINGS)	PACIFICORP ISSUE FUND GRANT
COMPANY,)	& PROPOSED BUDGET
)	
Application for Authorization to Acquire)	
Pacific Power & Light, dba PacifiCorp.)	
_____)	

The Citizens' Utility Board of Oregon (CUB) requests a grant of \$76,455 from the PacifiCorp Issue Fund.

CUB is precertified as per OAR 860-012-0100(3)(a). UM 1209 is an eligible proceeding under the Intervenor Funding Agreement, adopted by the Commission in Order No. 03-388 (July 2, 2003), because the proceeding directly affects PacifiCorp, a participating public utility. Agreement, 1(c). CUB filed its Notice of Intent to Request a PacifiCorp Issue Fund Grant concurrent with its Notice of Intervention, as required by the Intervenor Funding Agreement. Agreement 6.2.

Pursuant to paragraph 6.3 of the Intervenor Funding Agreement, the proposed budget must identify certain points of information. We provide the information below.

1) *Statement of Work to be Performed:* CUB intends to participate in every procedural aspect of this case. We have participated in the pre-hearing conference. We will attend and participate in all or most workshops, hearings, Commission presentations, and settlement meetings. We will review and analyze opening testimony, opening

comments, supplemental testimony, rebuttal testimony, sursurrebuttal testimony, and briefs filed by PacifiCorp as well as testimony, surrebuttal testimony, and briefs filed by other parties. We will pursue extensive discovery of PacifiCorp through data requests, and we will respond to data requests asked of us. We will file opening comments, testimony, surrebuttal testimony, and briefs. We will identify and research risks and benefits associated with this application, and propose appropriate conditions to protect customers from identified risks. We will develop a position about whether the application meets the statutory requirements, and offer a recommendation to the Commission.

- 2) *Description of Areas to be Investigated:* CUB intends to investigate many issues related to this application, including, but not limited to the following:
 - A. Issues relating to the financing of the proposed application, including the debt levels at PacifiCorp, PPW Holdings LLC, and MidAmerican Energy Holdings Company, the tax implications of that financing, the effects of the financing on PacifiCorp's, PPW Holding LLC's, and MidAmerican Energy Holdings Company's access to capital at reasonable terms, the risks that such financing places on customers, and the effects of the financing on the cash liquidity that provides flexibility to PacifiCorp.
 - B. Issues relating to the general operation of PacifiCorp, including: The expected cash flows and financial projections; operating plans; retention of adequate financial, human and technological resources; resource planning and development of a least cost, least risk power supply; and maintenance and improvement of service quality.

- C. Issues relating to important public policy concerns for Oregonians, including the affects that this application will have on: The Energy Trust of Oregon; the portfolio of energy options offered to customers; direct access to industrial customers; the Governor's Global Warming initiative; environmental issues relating to the operation of hydroelectric facilities, renewable resources and fossil fuels; and the implementation of SB 408.
- D. Issues relating to the ownership of a public utility by a large, diversified holding company with many subsidiaries and affiliates, including the preservation of regulatory access to personnel and records.
- E. Issues relating to the repeal of the Public Utility Holding Company Act (PUHCA), including the increased risks placed on customers from the repeal of PUHCA, and the increased regulatory burdens placed on the Commission, its staff, and its stakeholders by the repeal of PUHCA.
- F. Issues relating to MidAmerican and its operations including a review of MidAmerican's business model, its history in other states, and the risks associated with MidAmerican control of PacifiCorp.
- G. Issues related to how MidAmerican will affect the multi-state nature of PacifiCorp, including its approach to resource decisions, cost allocation, and maintaining its Oregon Headquarters.
- H. The overall issue of Net Benefit versus risk.

3) *Description of the Class or Classes Benefiting from CUB's Participation:* CUB represents the interests of PacifiCorp's residential customers, though other customer classes may benefit from many aspects of our participation.

- 4) *The Specific Fund from which CUB Seeks an Issue Fund Grant:* CUB is seeking an issue fund grant from the PacifiCorp Issue Fund.
- 5) *The Budget Showing Estimated Fees and Costs:* CUB's budget accompanies this document as Attachment 1. CUB's budget includes the cost of a consultant for financial analysis and a consultant for corporate analysis. CUB notes that, because this case will carry over into 2006, PacifiCorp's Issues Funds from 2006 will be available. The total grant request from the PacifiCorp Issues Fund is \$76,455. This assumes a fully litigated case; settlement of some or all issues would reduce the ultimate request for reimbursement. CUB staff will keep track of their participation by hours and activity.

Dated this 29th Day of August, 2005.
Respectfully submitted,

A handwritten signature in black ink that reads "Jason Eisdorfer". The signature is written in a cursive style with a long horizontal line extending to the right.

Jason Eisdorfer #92292
Attorney for Citizens' Utility Board of Oregon

UM 1209 CUB Intervenor Funding Budget

CUB Internal Expenses	Hours	Rate	Cost
<i>Staff:</i>			
Bob Jenks, Executive Director		\$38.02	
discovery	30		
case preparation	75		
communications	10		
settlement	50		
hearings and workshops	50		
procedural matters	15		
briefing and oral argument	20		
Bob Subtotal	250		\$9,505
Jason Eisdorfer, Attorney		\$35.63	
discovery	25		
case preparation	40		
communications	15		
settlement	50		
hearings and workshops	50		
procedural matters	10		
briefing and oral argument	60		
Jason Subtotal	250		\$8,908
Lowrey Brown, Utility Analyst		\$32.75	
discovery	30		
case preparation	100		
communications	5		
settlement	50		
hearings and workshops	50		
procedural matters	10		
briefing and oral argument	35		
Lowrey Subtotal	280		\$9,170
Jeff Bissonnette, Organizing Director		\$32.75	
communications	15		
hearings and workshops	35		
Jeff Subtotal	50		\$1,638
<i>Staff Expenses:</i>			
Printing & Mailing			\$950
Travel			\$1,200
Internal Expenses Total			\$31,370

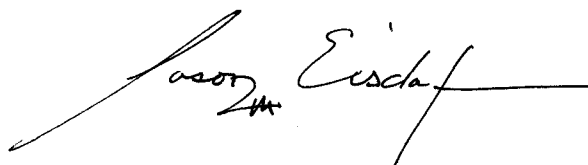
UM 1209 CUB Intervenor Funding Budget

CUB Consultant Expenses	Hours	Rate	Cost
<i>Financial:</i>			
Project Director	130	\$125	
Assistant Project Director	100	\$110	
Utility Analyst/Administration	82	\$42	
	Financial Subtotal		\$30,694
<i>PUHCA:</i>			
PUCHA Consultant	100	\$125	
	PUHCA Subtotal		\$12,500
<i>Consultant Expenses:</i>			
Airfare			\$750
Airport Mileage			\$81
Lodging			\$450
Local Transportation			\$150
Per Diem			\$210
Shipping			\$250
	Consultant Expenses Total		\$45,085
	CUB Total Budget		\$76,455

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of August, 2005, I served the foregoing Request for a PacifiCorp Issue Fund Grant and Proposed Budget of the Citizens' Utility Board of Oregon, in docket UM 1209 upon each party listed below, by email, or, when not available, by mail, postage prepaid, and upon the Commission by email and by sending 2 copies by U.S. mail, postage prepaid, to the Commission's Salem offices.

Respectfully submitted,



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