

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1234

In the Matter of)	
)	CUB REQUEST FOR A
PORTLAND GENERAL ELECTRIC,)	PGE ISSUE FUND GRANT &
)	PROPOSED BUDGET
)	
Application for Deferred Accounting of)	
Excess Power Costs Due to Plant Outage.)	
_____)	

The Citizens' Utility Board of Oregon (CUB) requests a grant of \$38,080 from the PGE Issue Fund.

CUB is precertified as per OAR 860-012-0100(3)(a). UM 1234 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 PGE, a participating public utility. Agreement, 1(c). CUB filed its Notice of Intent to Request a PGE 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 first pre-hearing conference. We will attend and participate in all settlement conferences and, if necessary, hearings and Commission presentations. We will review and analyze opening testimony,

supplemental testimony, rebuttal testimony, sursurrebuttal testimony, and briefs filed by PGE as well as testimony, surrebuttal testimony, and briefs filed by other parties if such materials are filed in this docket. We will pursue discovery of PGE through data requests, and we will respond to data requests asked of us. If necessary, we will file opening testimony, surrebuttal testimony, and briefs.

2) *Description of Areas to be Investigated:* CUB intends to investigate issues related to this deferred accounting application, including, but not limited to the following:

A. Issues relating to the cause of the Boardman outage, including an examination of the maintenance of that facility.

B. Issues relating to replacement power, including identifying the cost associated with replacing the power that Boardman was expected to generate, and examination of the actions PGE has taken to minimize that cost.

C. Issues relating to allocation of these costs between customers and the utility, including the applicability of Commission Order No. 05-1070 in UM 1147.

3) *Description of the Class or Classes Benefiting from CUB's Participation:*

CUB represents the interests of PGE'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 PGE Issue Fund.

5) *The Budget Showing Estimated Fees and Costs:* CUB's budget accompanies this document as Attachment 1. CUB notes that we have increased the billing rate that we are charging for internal attorney and expert witness costs. While we believe the rate we are proposing in this budget is below the market rate, we also believe that this

budget reflects a reasonable solution to the billing rate disparity issue that has been discussed at PUC stakeholder meetings over the last year. The total grant request from the PGE Issues Fund is \$38,080. This assumes a fully litigated case; settlement of the case would reduce the ultimate request for reimbursement. CUB staff will keep track of their participation by hours and activity.

Dated this 20th Day of January, 2006
Respectfully submitted,

A handwritten signature in black ink that reads "Jason Eisdorfer". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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

UM 1234 CUB Intervenor Funding Budget

CUB Internal Expenses	Hours	Rate	Cost
<i>Staff:</i>			
Bob Jenks, Executive Director		\$115.00	
discovery	15		
case preparation	30		
communications	5		
settlement	30		
hearings and workshops	10		
procedural matters	2		
briefing and oral argument	15		
Bob Subtotal	107		\$12,305
Jason Eisdorfer, Attorney		\$150.00	
discovery	10		
case preparation	25		
communications	10		
settlement	30		
hearings and workshops	15		
procedural matters	10		
briefing and oral argument	20		
Jason Subtotal	120		\$18,000
Lowrey Brown, Utility Analyst		\$75.00	
discovery	20		
case preparation	35		
communications	5		
settlement	30		
hearings and workshops	2		
procedural matters	2		
briefing and oral argument	5		
Lowrey Subtotal	99		\$7,425
<i>Staff Expenses:</i>			
Printing & Mailing			\$150
Travel			\$200
CUB Internal Expense			\$38,080
CUB Total Budget			\$38,080

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of January, 2006, I served the foregoing Intervenor Funding Proposal and Budget of the Citizens' Utility Board of Oregon in docket UM 1234 upon each party listed below, by email and U.S. mail, postage prepaid, and upon the Commission by email and by dropping off 6 copies at the Commission's Salem offices.

Respectfully submitted,



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

RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com	MELINDA J DAVISON DAVISON VAN CLEVE PC 333 SW TAYLOR - STE 400 PORTLAND OR 97204 mail@dvclaw.com
RANDALL J FALKENBERG RFI CONSULTING INC PMB 362 8351 ROSWELL RD ATLANTA GA 30350 consultrfi@aol.com	DOUGLAS C TINGEY PORTLAND GENERAL ELECTRIC 121 SW SALMON 1WTC13 PORTLAND OR 97204 doug.tingey@pgn.com
STEPHANIE S ANDRUS REGULATED UTILITY & BUSINESS 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us	