

resources, and locational marginal pricing to allocate power costs.

(b) Significance of any policy issues directly attributable to MSP Activities: The division of costs across the system has significant financial and policy impacts. Retaining the benefits of regional hydro resources within the Northwest is important because the region also bears the costs associated with hydro resources. In addition, DSM investment in Oregon is greater than other states, thus reducing the need for new resources. However, because new generating resources are allocated to the system and DSM is allocated to the state, Oregon is picking up a greater share of load growth of other states than those states are of Oregon's load growth. Also, varying state policies regarding accelerated depreciation or extending the life of coal generating units have created additional issues in allocating the costs and resources of the Company's system. Finally, the treatment of Oregon's RPS and the accounting of Renewable Energy Credits (RECs) could have significant financial impacts between different PacifiCorp states.

(c) MSP Activities schedule: MSP Activities include attendance at MSP Workgroup meetings, teleconferences, and the annual Commissioner Forum, in addition to associated communications with MSP participants, review of materials distributed by PacifiCorp or other MSP stakeholders, and any follow-up activity. There is a MSP Workgroup meeting on June 27th and 28th, 2019 in Salt Lake City. Additional MSP workgroup meetings are expected in subsequent months.

(d) Participation of other parties in MSP Activities that adequately represent the interests of customers: CUB represents the interests of PacifiCorp's Oregon residential customers. No other organization adequately represents the interests of

PacifiCorp's residential ratepayers in Oregon. Other customer classes may also benefit from many aspects of our participation.

- (e) *Statement of MSP Activities to be performed by CUB:* CUB staff will keep track of their participation by hours and activity.
- (f) *Description of the areas to be investigated by CUB relating to MSP Activities:* CUB is interested in the extent Oregon is bearing an oversized burden from load growth in other states, and whether Oregon is receiving the benefits of the hydro assets that historically flow to the Northwest. CUB will continue to advocate for the interests of Oregon's residential customers in light of the impacts of SB 1547, and varying state policies throughout PacifiCorp's system.
- (g) *Budget of MSP Activities:* CUB's budget accompanies this document as Attachment A.
- (h) *A Representation of the use of matching funds:* CUB will use matching 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 MSP Activities to be performed for which CUB is seeking an MSP Fund Grant.

Dated this 24th day of June, 2019.

Respectfully submitted,



Executive Director
Oregon Citizens' Utility Board

Post Script: Our Office Manager has been receiving treatments for breast cancer over the

last six months, and this particular filing slipped her notice until earlier this month. Please accept our apologies and accept this filing.

Attachment A

CUB Amended Budget -- UM 1586

CUB Internal Expenses	Rate	Hours	Cost
<i>Staff</i>			
Bob Jenks, Executive Director	\$250	85.00	\$21,250.00
Michael Goetz, Staff Attorney	\$225	82.00	\$18,450.00
Essie Bender, Office Manager	\$100	3.75	\$375.00
Will Gehrke, Economist	\$200	81.00	\$16,200.00
Sudeshna Pal, Economist	\$175	35.00	\$6,125.00
 <i>Other Expenses</i>			
Travel			100.00
SubTotal			\$62,500.00
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In-House Resources			
20% of Eligible Expenses			\$12,500
Total			\$50,000