

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1586**

In the Matter of	)	
	)	CUB REQUEST FOR A
PACIFICORP, dba PACIFIC POWER	)	MSP FUND GRANT & PROPOSED
	)	BUDGET
Multi-State Process Intervenor Funding	)	
Agreement	)	
_____	)	

The Citizens' Utility Board of Oregon (“CUB”) hereby requests a grant of \$25,000 from the Multi-State Process (“MSP”) Fund. The Commission adopted the MSP Intervenor Funding Agreement (“MSP IFA”) on March 27, 2012 in Order No. 12-110 (docket number subsequently corrected in Order No. 12-122) to provide funding for “MSP Activities.” See MSP IFA, Article 1(g). CUB is a “Participating Intervenor” under Article 1(a) of the MSP IFA.

Pursuant to Article 5.1 of the MSP IFA, the proposed budget must identify certain points of information. We provide the information below.

*(a) Statement of the breadth and complexity of the MSP Activities:* The MSP has established the Broad Review Workgroup, which is designing the modeling of alternatives cost allocation approaches, including structural separation of control areas and a fully rolled-in single system, in order to inform future negotiations between the PacifiCorp states. CUB is a member of the Broad Review Workgroup.

*(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. 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:* The Broad Review Group meets monthly by phone or in person.
- (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 that 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.
- (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 6<sup>th</sup> day of February, 2015  
Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bob Quits". The signature is fluid and cursive, with a long horizontal stroke at the end.

Executive Director  
Citizens' Utility Board of Oregon

Attachment A

**CUB Budget - UM 1586**

<b>CUB Internal Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
<i>Staff</i>			
Bob Jenks, Executive Director	\$250	50	\$12,500
Catriona McCracken, General Counsel	\$250	8	\$2,000
Jaime McGovern, Sr. Utility Analyst	\$225	25	\$5,625
Sommer Templet, Staff Attorney	\$175	50	\$8,750
<i>Other Expenses</i>			
Printing, Supplies, and Materials			\$125
Travel			\$2,250
<b>In-House Resources</b>			
20% of Eligible Expenses			(\$6,250)
<b>Total</b>			<b>\$25,000</b>

## UM 1586 – CERTIFICATE OF SERVICE

I hereby certify that, on this 6<sup>th</sup> day of February, 2015, I served the foregoing **CUB REQUEST FOR A MSP FUND GRANT & PROPOSED BUDGET** to each party listed in the UM 1586 PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

**(W denotes waiver of paper service)**

**(C denotes service of Confidential material authorized)**

**W PACIFICORP**  
SARAH WALLACE  
825 NE MULTNOMAH ST STE 1800  
PORTLAND OR 97232  
[sarah.wallace@pacificorp.com](mailto:sarah.wallace@pacificorp.com)

**W DAVISON VAN CLEVE**  
MELINDA J DAVISON  
333 SW TAYLOR - STE 400  
PORTLAND OR 97204  
[mjd@dvclaw.com](mailto:mjd@dvclaw.com);

**W PACIFICORP**  
OREGON DOCKETS  
825 NE MULTNOMAH ST, STE 2000  
PORTLAND OR 97232  
[oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)

Respectfully submitted,



Staff Attorney OSB #105260  
Citizens' Utility Board of Oregon  
610 SW Broadway, Ste. 400  
Portland, OR 97205  
(503) 227-1984 phone  
(503) 224-2596 fax  
[sommer@oregoncub.org](mailto:sommer@oregoncub.org)