

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1713**

In the Matter of	)	
	)	CUB REQUEST FOR
PUBLIC UTILITY COMMISSION OF	)	ISSUE FUND GRANTS &
OREGON	)	PROPOSED BUDGET
	)	
Investigation into Large Customer Energy	)	
Efficiency Limitations	)	
_____	)	

The Citizens' Utility Board of Oregon (“CUB”) requests a total grant of \$35,000, to be split between the Portland General Electric (“PGE”) Issue Fund and the PacifiCorp Issue Fund, as described below. This presumes a fully litigated case; settlement of some or all of the issues would likely reduce our total request for reimbursement. CUB staff will keep track of their participation by hours and activity.

CUB is precertified per OAR 860-012-0100(3)(a). UM 1713 is an eligible proceeding under the Second Amended and Restated Intervenor Funding Agreement (“IFA”), as approved by the Oregon Public Utility Commission in Order No. 12-452, entered November 20, 2012. The proceeding directly affects PGE and PacifiCorp, which are participating public utilities under the IFA. *See* Order No. 12-452 at Article 1(k). CUB filed its Notice of Intent to Request an Issue Fund Grant concurrent with its Notice of Intervention, as required by the IFA (Article 6.2). CUB respectfully requests that the Commission waive the timing requirement found in IFA Article 6.3, which provides a deadline for submitting proposed budgets of 30 days after the prehearing conference at

which the schedule for the proceeding is established.

Pursuant to paragraph 6.3 of the IFA, the proposed budget must identify certain points of information. CUB provides the information below.

*(a) Statement of Work to Be Performed:* CUB intends to participate in every procedural aspect of this case. CUB participated in the pre-hearing conference. We will attend, either in person or by phone, and participate in all or most workshops, settlement meetings, hearings, and any Commission presentations. We will review Staff's initial framing document, and submit opening comments. We will review and analyze the comments filed by other parties. We will pursue discovery, as appropriate, and will respond to data requests asked of us. We will present our recommendations to the Commission and participate in any additional process that may be subsequently added to the schedule in this docket.

*(b) Description of Areas to Be Investigated:* CUB intends to investigate issues including, but not limited to:

- A. Whether customers with loads greater than 1 MWa are receiving a direct benefit from conservation measures funded by amounts collected pursuant to SB 838;
- B. The meaning of "any direct benefit" as used in ORS 757.689(2)(b);
- C. Whether there are any barriers that prevent ETO from obtaining all cost-effective energy efficiency;
- D. If there are barriers, whether there are other options to gain all cost-effective energy efficiency, including from customers with loads greater than 1 MWa;
- E. Whether the ETO approach to funding energy efficiency should be flexible in order to take advantage of energy efficiency savings brought about by changes

in technology and the economy;

- F. Whether there should continue to be a cap on energy efficiency funding provided by the ETO to PGE and PacifiCorp customers with loads greater than 1 MWa and, if so, what criteria should be used to set such a cap; and
- G. Issues raised by other parties to the proceeding.

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

CUB represents the interests of PGE's and PacifiCorp's residential customers, though other customer classes may benefit from many aspects of our participation.

*(d) The Fund from Which CUB Seeks an Issue Fund Grant & Available Funds:* CUB is seeking issue fund grants from the 2015 PGE Issue Fund and the 2015 PacifiCorp Issue Fund. CUB's budget shows total eligible expenses of \$62,500, and seeks an issue fund grant of \$10,000 from the 2015 PGE Issue Fund and \$25,000 from the PacifiCorp Issue Fund.<sup>1</sup> As of February 26, 2015, the current available balance of PGE's 2015 Issue Fund is \$118,604.81; the current available balance of PacifiCorp's 2015 Issue Fund is \$91,435.52.

*(e) The Budget Showing Estimated Fees and Costs:* CUB's budget accompanies this document as Attachment A.

*(f) A Representation of the Use of Matching Funds:* The budget and an accounting for the use of matching funds accompany this document as Attachment A.

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<sup>1</sup> CUB's proposed budget in this docket shows eligible expenses of \$50,000, after the 20% match, which it proposes to split between the 2015 PGE Issue Fund and the 2015 PacifiCorp issue fund. Due to its own outstanding requests for PGE issue funds in other dockets and the need to accommodate the requests of other intervenors for PGE's issue funds, CUB is reducing its request for PGE funds in this docket. Should additional PGE funds become available at a later date, CUB may request to amend its request for an issue fund grant in this docket.

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Dated this 27<sup>th</sup> day of March, 2015  
Respectfully submitted,

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

Bob Jenks  
Executive Director  
Citizens' Utility Board of Oregon

## CUB Proposed Budget -- UM 1713

<b>CUB Internal Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
<i>Staff</i>			
Bob Jenks, Executive Director	\$250	70.00	\$17,500.00
Jaime McGovern, Senior Economist	\$225	110.00	\$24,750.00
Nadine Hanhan, Utility Analyst	\$125	20.00	\$2,500.00
Sommer Templet, Staff Attorney	\$175	100.00	\$17,500.00
 <i>Other Expenses</i>			
Printing & Mailing			\$50.00
Travel			\$200.00
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<b>In-House Resources</b>			
20% of Eligible Expenses			(\$12,500)
<b>Total</b>			<b>\$50,000</b>
<b>CUB Request*</b>			<b>\$35,000.00</b>
PGE Request			\$10,000.00
PacifiCorp Request			\$25,000.00

\*CUB's proposed budget in this docket shows eligible expenses of \$50,000, after the 20% match, which it proposes to split evenly between the 2015 PGE Issue Fund and the 2015 PacifiCorp issue fund. Due to its own outstanding requests for PGE issue funds in other dockets and the need to accommodate the requests of other intervenors for PGE's issue funds, CUB is reducing its request for PGE funds in this docket.