

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1716**

In the Matter of	)	
	)	
PUBLIC UTILITY COMMISSION OF	)	CUB REQUEST FOR AN ISSUE FUND
OREGON	)	GRANT & PROPOSED BUDGET
	)	
Investigation to Determine the Resource Value	)	
<u>of Solar</u>	)	

The Citizens' Utility Board of Oregon (“CUB”) estimates eligible expenses of \$37,500 before the 20% match, and requests a grant of \$12,000 from the 2016 Portland General Electric (“PGE”) Issue Fund, \$12,000 from the 2016 PacifiCorp Issue Fund, and \$6,000 from the 2016 Idaho Power Issue Fund. CUB staff have been tracking their participation in this docket by hours and activity.

CUB is pre-certified per OAR 860-012-0100(3)(a). UM 1716 is an eligible proceeding under the Third Amended and Restated Intervenor Funding Agreement (“IFA”), as approved by the Oregon Public Utility Commission in Order No. 15-335, entered October 20, 2015 and the Idaho Power-CUB Intervenor Funding Agreement (“Idaho Power IFA”), as approved by the Commission in Order No. 16-028, entered January 26, 2016. The proceeding directly affects PGE, PacifiCorp, and Idaho Power, which are all participating public utilities under their respective intervenor funding agreements. *See* IFA at Article 1(k); Idaho Power IFA, Article 1(h). 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; Idaho Power IFA Article 6.2.

Pursuant to Article 6.3 of the IFA and Article 6.3 of the Idaho Power 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 prehearing conference, all workshops, and settlement meetings. CUB will also attend and participate in the hearing scheduled for this docket. CUB has reviewed and analyzed the testimony and briefs filed in this docket, and will review the briefs yet to be filed. We have pursued discovery of UM 1716 through data requests. We have filed testimony and a prehearing brief, and will participate in the hearing and file a post-hearing brief in this docket.

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

- i. Determination of the attributes considered in identifying a resource value of solar.
- ii. Determination of the benefits of solar to the utility system, including avoided costs, avoided capacity, avoided transmission and distribution investment, and avoided carbon compliance costs.

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

CUB represents the interests of PGE, PacifiCorp and Idaho Power 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 \$12,000 from the 2016 Portland General Electric ("PGE") Issue Fund, \$12,000 from the 2016 PacifiCorp Issue Fund, and \$6,000 from the 2016 Idaho Power Issue Fund. CUB's budget shows eligible expenses, before the match, of \$37,500 but CUB limits its request in this case to \$30,000. Section 4.4 of the IFA permits the Commission to "approve an Issue Fund Grant from funds that will be made available in the next calendar year when the proceeding for which the Issue Fund are inadequate to provide the level of Issue Fund Grants that the Commission determines is appropriate." Although some work and settlement conferences for UM 1716 took place in 2015, significant activity is expected to take place in 2016. CUB respectfully requests that the Commission approve CUB's request for a \$12,000 grant from the 2016 PGE Issue Fund, a \$12,000 grant from the 2016 PacifiCorp Issue Fund, and a

\$6,000 grant from the 2016 Idaho Power Issue Fund.

(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.

Dated this 25th day of February, 2016

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 1716

<b>CUB Internal Expenses</b>	<b>Rate</b>	<b>Hours</b>	<b>Cost</b>
<i>Staff</i>			
Bob Jenks, Executive Director	\$250	60.00	\$15,000.00
Nadine Hanhan, Economist	\$125	70.00	\$8,750.00
Staff Attorney	\$175	67.00	\$11,725.00
Paralegal	\$75	25.00	\$1,875.00
<i>Other Expenses</i>			
Printing, Mailing & Travel			\$150.00
Outside Expert Witness			
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<b>In-House Resources</b>			
20% of Eligible Expenses			(\$7,500)
<b>Total</b>			<b>\$30,000</b>