

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UE 374

IN THE MATTER OF:	)	
	)	
PACIFICORP d/b/a PACIFIC POWER	)	PETITION OF SMALL
	)	BUSINESS UTILITY ADVOCATES
Request for General Rate Revision	)	FOR CASE CERTIFICATION
	)	
	)	
	)	

**1. INTRODUCTION**

Small Business Utility Advocates (“SBUA”), having been granted Intervenor status on March 2, 2020, petitions the Oregon Public Utility Commission (“Commission”) pursuant to OAR 860-001-0120(4), the Fourth Amended and Restated Intervenor Funding Agreement approved by Order 18-017 on January 17, 2018 (hereinafter “Agreement”), and Administrative Law Judge (“ALJ”) Lackey’s March 6, 2020 Prehearing Conference Memorandum to certify SBUA for the purposes of receiving intervenor funding and to permit SBUA to submit a Proposed Budget.<sup>1</sup> The Proposed Budget is attached herein as Exhibit 1.

In support of this Petition for Case Certification, SBUA represents as follows:

**2. CRITERIA FOR CERTIFICATION OF INTERVENORS**

Under the Agreement and Oregon Administrative Rules, to be case certified for purposes of receiving intervenor funding, an organization must meet certain criteria set forth in the rule. *See* OAR 860-001-0120(4). Specifically, an organization can qualify for certification if “(a) The organization is a nonprofit organization, demonstrates that it is in the process of becoming a nonprofit organization, or is comprised of multiple customers of one or more of the utilities that are

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<sup>1</sup> Agreement, Article 1(c)(i).

parties to the agreement and demonstrates that a primary purpose of the organization is to represent broad utility customer interests; (b) The organization represents the interests of a broad class of customers and its participation in the proceedings will be primarily directed at public utility rates or terms and conditions of service affecting those customers, and not narrow interests or issues that are ancillary to the effect of the rates and terms and conditions of service on those customers; (c) The organization demonstrates that it is able to effectively represent the particular class of customers it seeks to represent; (d) Those members of the organization who are customers of one or more of the utilities that are affected by the proceedings and are parties to the agreement contribute a significant percentage of the overall support and funding of the organization; (e) The organization demonstrates or has demonstrated in past Commission proceedings the ability to substantively contribute to the record on behalf of customer interests related to rates and the terms and conditions of service, including in proceedings in which the organization was case certified and received a grant; (f) The organization demonstrates that: (A) No precertified intervenor participating in the proceedings adequately represents the specific interests of the class of customers represented by the organization; or (B) The specific interests of a class of customers will benefit from the organization's participation; and (g) The organization demonstrates that its request for case certification will not unduly delay the proceedings.”

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### 3. APPLICABILITY OF CRITERIA TO SBUA

For the reasons set forth below, SBUA meets the criteria for certification set forth in OAR 860-001-0120(4):

*(a) Nonprofit Status*

SBUA is an Internal Revenue Code Section 501(c)(3) nonprofit organization comprised of multiple customers of PacifiCorp. SBUA's primary purpose is representing the interests of small businesses in utility proceedings.<sup>2</sup> SBUA members in Oregon include many customers of PacifiCorp d.b.a. Pacific Power ("Company").

*(b) Broad Representation with Participation Directed at Public Utility Rates or Terms and Condition of Service affecting those Customers, and Not Narrow Interests or Ancillary Issues*

SBUA represents small business which is a large, broad, and diverse class of customers. Most businesses in Oregon are "small businesses", that is, those with 100 or fewer employees, as defined by the Oregon Small Business Development Act.<sup>3</sup> Oregon's Small Business Advocate defines small business as a for-profit or nonprofit organization with zero to 100 employees.<sup>4</sup> The U.S. Small Business Administration ("SBA") statistics show that the number of small businesses in Oregon with twenty or fewer employees numbered approximately 80,000 in 2015.<sup>5</sup> According

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<sup>2</sup> See [www.utilityadvocates.org](http://www.utilityadvocates.org).

<sup>3</sup> ORS 285B.123(2).

<sup>4</sup> ORS 56.200; <https://www.oregon.gov/smallbusiness/Pages/default.aspx> (last accessed 3/2/20).

<sup>5</sup> U.S. Small Business Office of Advocacy 2018 Small Business Profile Oregon, [www.sba.gov/sites/default/files/advocacy/2018-Small-Business-Profiles-OR.pdf](http://www.sba.gov/sites/default/files/advocacy/2018-Small-Business-Profiles-OR.pdf) (last accessed 3/2/20).

to an Oregon Employment Department, in 2018 nine out of 10 private-sector firms in Oregon had fewer than 20 employees in March 2018.<sup>6</sup>

SBUA represents a broad diversity of these businesses. SBUA members in Oregon include small businesses from diverse industries including shoe repair, bicycling, hair salons, pest management, commercial cleaning and maintenance, artisanal glass, insurance consult, website hosting and data center operations, wood products milling, food and beverage, commercial agriculture, small business consulting, residential and commercial construction, energy efficiency, and renewable energy consulting, multi-family residential housing, among others. Some members are already known to the parties in this proceeding via testimony in various filings previously submitted to the Commission. *See* UE 294<sup>7</sup>, UM 1751<sup>8</sup>, UM 1773.<sup>9</sup> SBUA members in Oregon are located in various parts of the state including several areas served by PacifiCorp d/b/a Pacific Power. SBUA is comprised of and represents small businesses exclusively, and SBUA constituents are distinct from the AWEC's and CUB's constituents.

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<sup>6</sup> [https://www.qualityinfo.org/-/most-oregon-employers-have-fewer-than-20-employees?redirect=https%3A%2F%2Fwww.qualityinfo.org%2Fstaff%3Fp\\_p\\_id%3D3%26p\\_p\\_lifecycle%3D0%26p\\_p\\_state%3Dmaximized%26p\\_p\\_mode%3Dview%26\\_3\\_groupId%3D0%26\\_3\\_keywords%3Dfirm%2Bsize%26\\_3\\_struts\\_action%3D%252Fsearch%252Fsearch%26\\_3\\_redirect%3D%252Fstaff%253Fstaffid%253Dknoderea%2526companyid%253D10155&inheritRedirect=true](https://www.qualityinfo.org/-/most-oregon-employers-have-fewer-than-20-employees?redirect=https%3A%2F%2Fwww.qualityinfo.org%2Fstaff%3Fp_p_id%3D3%26p_p_lifecycle%3D0%26p_p_state%3Dmaximized%26p_p_mode%3Dview%26_3_groupId%3D0%26_3_keywords%3Dfirm%2Bsize%26_3_struts_action%3D%252Fsearch%252Fsearch%26_3_redirect%3D%252Fstaff%253Fstaffid%253Dknoderea%2526companyid%253D10155&inheritRedirect=true) (last accessed 3/3/20).

<sup>7</sup> UE 294 SBUA Testimony <https://edocs.puc.state.or.us/efdocs/HTB/ue294htb17027.pdf>.

<sup>8</sup> UM 1751 SBUA Comments <https://edocs.puc.state.or.us/efdocs/HAC/um1751hac135915.pdf>

<sup>9</sup> UM 1773 Petition of Small Business Utility Advocates for Case Certification page 3 reference to Confidential Exhibit A including identities of some SBUA members <https://edocs.puc.state.or.us/efdocs/HAH/um1773hah133929.pdf>.

SBUA participation in this docket is directed primarily at ensuring any rate change is just and reasonable to small businesses with focus on small nonresidential ratepayers who are Schedule 23. In this docket, SBUA's issues include the following:

1. The impact of the Company's proposed return on equity increase ("ROE") on Schedule 23 ratepayers.
2. The impact of the Company's proposed new system investment costs on Schedule 23 ratepayers.
3. The proper allocation of asset depreciation rates.
4. Implementation of the 2020 PacifiCorp Inter-Jurisdictional Allocation Protocol ("2020 Protocol") in these proceedings as it impacts Schedule 23 ratepayers.

*(c) Demonstrated Effective Representation*

SBUA's expert witness and legal counsel individually and combined have demonstrable effective representation in electric utility regulation. SBUA's expert, William Steele of Steele and Associates, ("Steele") is an experienced electric utility ratemaking consultant with over three decades experience in analyzing and advising, and providing expert testimony in electric utility and other utility dockets. Steele's qualifications are attached herein as Exhibit 2. Steele's expertise would significantly assist the analysis of the justness and reasonableness of the Company's request as it concerns small business and especially small non-residential customers who are Schedule 23 ratepayers.

SBUA's counsel has represented and provided counsel for over ten years to numerous Oregon small businesses and is experienced in energy and utility matters in Oregon. Since SBUA's inception in Oregon, its legal counsel has educated SBUA membership on utility regula-

tory matters impacting small business. SBUA was an intervenor in Commission Dockets UM 1610, UE 294, UM 1751, UM 1754, UM 1773, and UM 1790, and SBUA also participated in the 2017 public input process of SB 978 and submitted comments responsive to the Commission's request in that process. SBUA has demonstrated the ability to represent small business within the scope of its intervention in these matters, including preparing expert testimony, filing documents, and participating in docket workshops and other proceedings. SBUA has filed small business testimony in previous dockets, demonstrating for the Commission the impact of increased rates on small nonresidential customers in UE 294, for example, and has advocated for small nonresidential customers in dockets evaluating the Company's renewable portfolio plan implementation in UM 1754 and UM 1790, then evaluating utility planning in the context of the then newly enacted SB 1547 increasing the renewable portfolio standard.<sup>10</sup>

*(d) Members who are Utility Customers Contribute a Significant Percentage of the Overall Support and Funding of the Organization*

SBUA members in Oregon include Pacific Power ratepayers. Pacific Power ratepayers contribute a significant percentage of the overall member support of SBUA in the form of dues, in-kind contributions, and donations. Support also comes in the form of general participation in the organization from SBUA members in Oregon, including Pacific Power Schedule 23 ratepayers from Portland metro, central Oregon, the central coast, and Willamette Valley.

*(e) Demonstrated Ability to Substantively Contribute to the Record on Behalf of Customer Interests*

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<sup>10</sup> SBUA Comments available at <http://edocs.puc.state.or.us/efdocs/HAC/um1754hac82346.pdf>

SBUA has demonstrated its ability to contribute in previous Commission dockets on behalf of customer interests related to rates, and terms and conditions of service. In UE 294 and UM 1610, SBUA supplied expert testimony informing the Commission on the state of small business in Oregon, the impact of PURPA renewable energy generation projects, comparing rate increases in a general rate case, then participating in briefing and in settlement negotiations and providing meaningful input on behalf of its members.<sup>11</sup> SBUA received case certification in 2016 in UM 1751 regarding HB 2193 Implementing an Energy Storage Program Guidelines, in 2016 in UM 1754 regarding the Company's 2017-2021 Renewable Portfolio Standard Implementation Plan for the Company filed in 2015, in 2017 in UM 1790 regarding the Company's 2017-2021 Renewable Portfolio Standard Implementation Plan filed in 2016, and in 2016 in UM 1773 regarding Portland General Electrical Partial Waiver of Competitive Bidding Guidelines, approval of RFP Schedule. SBUA has an ability to contribute to the record in the Commission dockets, and has demonstrated for the record statistical familiarity with the state's small business constituency and impact of the proceedings on small business.

Further, SBUA's retained expert, William Steele, has significant experience in electric utility ratemaking as utility commission staff, as a regular instructor for a nationally recognized electric utility ratemaking training, and as a state advisory board representing small business in utility matters.

SBUA's legal counsel has over 20 years of legal experience, including working on utility related issues in Oregon, advising clients in utility matters, working at Oregon Department of

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<sup>11</sup> See UE 294 SBUA Testimony <https://edocs.puc.state.or.us/efdocs/HTB/ue294htb17027.pdf>.

Energy and intervening in OPUC dockets, and counsel has received specialized training in electricity pricing and ratemaking.

*(f) No Other Adequate Representation and the Specific Interests of the Class will Benefit from Organization's Participation*

No party in these proceedings adequately represents the specific interests of small business or the Company's Small Nonresidential customers. The Citizens' Utility Board represents the residential customer class by statute, and stands to run a conflict given the different proposed rate impacts on residential and small non-residential customer classes. Alliance of Western Energy Consumers ("AWEC") represents the large non-residential customer classes. SBUA represents exclusively small business interests. Small nonresidential customers and Schedule 23 ratepayers will benefit from SBUA participation since SBUA will bring to the Commission expertise in reviewing docket filings as they pertain to the small non-residential class of customers and information pertinent to small business that the Commission is not likely to receive from any other source.

SBUA requests leave to submit an amended budget for consideration to increase SBUA's capacity to participate in the proceedings.

*(g) Participation will not Unduly Delay the Proceedings*

SBUA's participation will not unduly delay the proceedings per a schedule adopted in ALJ Lackey's March 6, 2020 Prehearing Conference Memorandum.

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#### 4. CONCLUSION

For the foregoing reasons, SBUA requests that the Commission grant this Petition.

RESPECTFULLY SUBMITTED March 10, 2020.



s/ Diane Henkels

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 374

In the Matter of	)	
	)	PROPOSED BUDGET
PACIFICORP, d.b.a. PACIFIC POWER	)	OF SMALL BUSINESS
	)	UTILITY ADVOCATES
Request for General Rate Revision	)	
_____	)	

**1. INTRODUCTION**

In the event the Commission approves SBUA’s Petition for Case Certification, intervenor Small Business Utility Advocates (“SBUA”) submits this Proposed Budget which is required to receive an issue fund grant<sup>1</sup> to assist SBUA’s representation in this docket UE 374 PacifiCorp d/ b/a Pacific Power (“Company”)’s Request for a General Rate Revision.

**2. REQUIREMENTS FOR AN ISSUE FUND GRANT PROPOSED BUDGET**

The Proposed Budget must include: (a) a statement of work to be performed by the applicant for which the applicant is seeking an Issue Fund Grant; (b) a description of the areas to be investigated by the intervenor; (c) a description of the particular customer class or classes that will benefit from the intervenor's participation; (d) identification of the specific account or accounts from which the intervenor is seeking an Issue Fund Grant and an estimate of the amount of available funds in that account; (e) a budget showing estimated attorney fees, which may include the cost for appropriate support staff and operational support; (f) a budget showing estimated consultant fees and expert witness fees, which may include the cost for appropriate sup-

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<sup>1</sup> Section 6.3 Fourth Amended and Restated Intervenor Funding Agreement, approved by Order 18-017 (“Agreement”).

port staff and operational support; and (g) a representation that the intervenor 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 work to be performed for which the intervenor is seeking an Issue Fund Grant.<sup>2</sup>

**(a) A statement of work to be performed by the applicant for which the applicant is seeking an Issue Fund Grant**

SBUA work to represent small nonresidential customers and small business in this docket will entail reviewing Company and other intervenor testimony and exhibits, drafting and responding to discovery requests, participating in workshops, settlement discussions, and hearings. SBUA will develop, draft and submit prefiled testimony, respond to discovery on prefiled testimony; press spare and file briefing, participate in workshops and in settlement discussions, and appear at hearings as required.

**(b) A description of the areas to be investigated by the intervenor**

SBUA will analyze docket information to determine whether capital costs included in general rate request (“Request”) were prudently incurred, to determine expenses incurred are a benefit to the small nonresidential ratepayer and should be recovered in rates. to determine whether the Company’s Request complies with standard principles of ratemaking, and for class cost-of-service studies and rate design in order to determine compliance with standard ratemaking principles; and examine all other issues raised by other parties to this proceeding.

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<sup>2</sup> Id.

**(c) A description of the particular customer class or classes that will benefit from the intervenor's participation.**

The particular customer class that would benefit from SBUA's participating in the proceeding is the small nonresidential ratepayer class, known as Schedule 23, though other small nonresidential ratepayers and other classes may also benefit.

**(d) Identification of the specific account or accounts from which the intervenor is seeking an Issue Fund Grant and an estimate of the amount of available funds in that account.**

The account from which SBUA seeks an Issue Fund Grant is PacifiCorp d.b.a. Pacific Power Issue Fund Grant. On March 10, 2020 an estimate of the amount of uncommitted funds in that account is \$144,424.18.<sup>3</sup>

**(e), (f), and (g) require a budget showing estimated attorney fees, which may include the cost for appropriate support staff and operational support, a budget showing estimated consultant fees and expert witness fees, which may include the cost for appropriate support staff and operational support, and a representation that the intervenor 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 work to be performed for which the intervenor is seeking an Issue Fund Grant.**

SBUA submits the attached Exhibit A as a Budget for the Issue Fund Grant requested. While not specifically required by the Agreement, mindful of the Commission's guidance directly on point in Orders 19-133 and 19-262, SBUA did seek to consult the Hearings Division on

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<sup>3</sup> Intervenor Funding: <https://www.oregon.gov/puc/filing-center/Pages/Intervenor-Funding.aspx> (last accessed 3/10/20).

March 5, 2020 regarding this request and had opportunity to have questions answered on March 9, 2020. Considering the preceding, SBUA also submits under seal as Exhibit B demonstration of SBUA's capacity to contribute expertise to this docket on behalf of small non-residential ratepayers. SBUA submits that should Case Certification not be granted and issue funds not be approved, SBUA would nevertheless represent its constituency with technical and legal expertise, however, that representation would be more limited.

### 3. CONCLUSION

SBUA submits the information above as its Proposed Budget to represent small business and small non-residential ratepayers for the Commission's consideration in allocating intervention funding.

RESPECTFULLY SUBMITTED March 10, 2019.



s/ Diane Henkels

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## **William (Bill) Steele**

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### **Summary of Qualifications**

Mr. Steele has over 40 years of experience in public utility regulation in which he has acquired extensive knowledge of the electric, gas and telecommunications industries. His expertise in revenue requirement, cost-of-service, cost of capital and rate design has allowed him to serve his clients in utility accounting and financial matters. Prior to forming Bill Steele and Associates LLC, Mr. Steele spent 34 years with the Colorado Public Utilities Commission as an Advisor to the Commissioners and as an expert witness. Mr. Steele has also been an instructor at the Center for Public Utilities "Basics of Regulation" training course for the last 21 years.

### **Professional Experience**

#### **2012 - Present      President, Bill Steele and Associates, LLC**

Following a 34-year career with the Colorado Public Utilities Commission, Mr. Steele formed a consulting practice in order to continue to provide his professional services in the area of regulatory policy development and rate regulation of public utilities. His expertise in revenue requirements, cost-of-service, cost of capital, and rate design allowed him to serve clients in the electric, gas and telecommunications industries. Some of Mr. Steele's clients have included Southwest Power Pool, Western Resource Advocates, the Alliance for Solar Choice, the Wired Group, Stride CPA Professional Services and EUCI. Mr. Steele also provides hands-on rate raining courses in public utility regulation, including how to apply traditional regulatory principles to emerging issues in public utility regulation. He also continues to serve in his long-term role as an instructor in the "Basics of Regulation" conference for the Center of Public Utilities at New Mexico State University. The topics Mr. Steele teaches at the "Basics of Regulation" conference are the Revenue Requirement and the Class Cost of Service Study models. On January 5, 2018, Colorado Governor Hickenlooper by Executive Order (A 2008 002) appointed Mr. Steele to serve as a representative of small business on the Utility Consumers Board (UCB). Mr. Steele as a board member of UCB, provides to the Office of Consumer Counsel general policy guidance on matters that involve utility regulation and legislative matters. In November 2018, he was elected Vice President of UCB.

#### **2004 -2012      Commission Advisor, Colorado Public Utilities Commission**

Mr. Steele served as an advisor to the three Colorado Public Utilities Commissioners and the Commission's six Administrative Law Judges. Mr. Steele demonstrated his broad expertise in the areas of electricity and natural gas utility regulation, which included the areas of revenue requirements, cost-of-service analysis and rate design. He also served in the role as the Commission's subject matter expert in utility accounting and finance matters.

In addition, Mr. Steele's advisory responsibilities included the training of new Commissioners as well as conducting in-house training courses on various utility issues, such as how to apply traditional regulatory principles to emerging

issues in public utility regulation.

### **1978 – 2004 Principal Financial Analyst, Colorado Public Utilities Commission**

Mr. Steele served in various roles as a financial analyst from 1978 until his promotion to supervisor in 1987. Mr. Steele supervised the Financial Analysts' in the Commission's Fixed Utilities Section. His duties in that role included the training of new financial analysts as well as providing expert testimony in rate case proceedings as well as testimony on policy issues concerning accounting, financial and operational matters.

Mr. Steele and his Financial Analyst's also conducted special investigations and audits including the circumstances that lead to the Colorado-Ute Electric Association's bankruptcy, which at that time was the largest bankruptcy in the history of the United States.

Mr. Steele has presented testimony in over 50 cases before the Colorado Public Utilities Commission, Denver District Court and United States District Court on accounting, financial and management issues.

Because of Mr. Steele's vast experience and his ability to effectively train commission staff, the three Commissioners and the Director of the Commission asked Mr. Steele to accept a position with as an Advisory to the Commissioners.

### **Degrees**

Bachelor of Science degree in Business Administration from the University of Northern Colorado

Masters in Business Administration degree from the University of Phoenix.

### **Recent Board Appointments**

On January 5, 2018, Colorado Governor Hickenlooper by Executive Order (A 2008 002) appointed Mr. Steele to serve as a representative of small business on the Utility Consumers Board (UCB). Mr. Steele as a board member of UCB, provides to the Office of Consumer Counsel general policy guidance on matters that involve utility regulation and legislative matters. In November 2018, he was elected Vice President of UCB.

### **Selected Consulting Projects of Bill Steele and Associates LLC**

"Application of Sierra Pacific Power Company d/b/a NV Energy for authority to adjust its annual revenue requirement for general rates charged to all classes of electric customers and for relief properly related there to", Docket No. 16-06006. In this proceeding, Mr. Steele presented expert witness written and oral testimony on behalf of Nevadans for Clean Affordable Reliable Energy ("NCARE") on the issue of fixed cost recovery for residential and small commercial customer classes, and the issue of having separate rate classes for net metered residential and small commercial customers.

"Petition of Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid for approval by the Department of Public Utilities of its Grid Modernization Plan." D.P.U. 15-120. In this proceeding, Mr. Steele is a technical consultant with the Wired Group who has been retained by the Office of Ratepayer Advocacy, Massachusetts Office of The Attorney General. In this docket, Mr. Steele is leading the investigation into

National Grid's proposed rate designs, cost recovery methods, and bill impact estimates as set forth in the Company's grid moderation plan.

"Petition of Fitchburg Gas and Electric Light Company d/b/a Unitil for approval by the Department of Public Utilities of its Grid Modernization." Plan. D.P.U. 15-121. In this proceeding, Mr. Steele is a technical consultant with the Wired Group who has been retained by the Office of Ratepayer Advocacy, Massachusetts Office of The Attorney General. In this docket, Mr. Steele is leading the investigation into Unitil's proposed rate designs, cost recovery methods, and bill impact estimates as set forth in the Company's grid moderation plan.

"Petition of NSTAR Electric Company and Western Massachusetts Electric Company, each d/b/a Eversource Energy, for approval by the Department of Public Utilities of their Grid Modernization Plan. "D.P.U. 15-122. In this proceeding, Mr. Steele is a technical consultant with the Wired Group who has been retained by the Office of Ratepayer Advocacy, Massachusetts Office of The Attorney General. In this docket, Mr. Steele is leading the investigation into Eversource's proposed rate designs, cost recovery methods, and bill impact estimates as set forth in the Company's grid moderation plan.

Mr. Steele was one of five independent experts chosen as the first Industry Expert Panel (IEP) for Southwest Power Pool (SPP). The purpose of the IEP was to evaluate and make recommendations to the SSP's Board of Directors concerning the competitive bids submitted for the construction of the Walkemeyer transmission project. Mr. Steele's primary area of review and evaluation was the financial viability and creditworthiness of the bidders as well as his secondary responsibility was to evaluate the bidder's proposed rate design. The IEP began its work in November 2015 and completed its work in May 2016 (7 months).

"In The Matter Of The Application Of El Paso Electric Company Of New Mexico For Revision Of Its Retail Electric Rates Pursuant To Advice Notice No. 236," Case No. 15-00127-UT. In this proceeding, Mr. Steele filed expert witness written testimony on behalf of The Alliance for Solar Choice ("TASC") opposing El Paso Electric's proposal to place DG customers into a separate rate class.

### **Recent Publications and Speeches**

"Price Cap Electric Ratemaking: Does it Merit Consideration?" Bill Steele and Paul Alvarez. Electricity Journal. In production for October, 2017 issue.

"Above the Line or Below the Line, Where Should the Cut Be?", 2014 Annual Meeting of the National Association of Regulatory Utility Commissioners Staff Subcommittee on Gas

"Alternatives to Traditional Ratemaking – History, Methodologies, Effects and Case Studies", National Association of Regulatory Utility Commissioners Staff Subcommittee on Accounting & Finance-Fall 2014 Conference

"Incentive Mechanisms", National Association of Regulatory Utility Commissioners Staff Subcommittee on Accounting & Finance-Fall 2013 Conference

"Benchmarking", National Association of Regulatory Utility Commissioners Staff Subcommittee on Accounting & Finance-Spring 2013 Conference

### **Electric Industry Training Presentations**

FERC Accounting 101 "The Basics of the Uniform System of Accounts (USofA) for electric and Gas Utilities." on behalf of EUCL



Executive Training on Uniform System of Accounts (USoA), Principles, Practice, & Case Studies, for Nigerian Distribution Utilities on behalf of Stride Professional Services U.S.A.

### **Electric Industry Presentations at the Center for Public Utilities**

The Process for Determining the Revenue Requirement  
Hands-on Revenue Requirement Problem  
The Process for Determining a Class Cost of Service Study  
Energy Efficiency Mandates  
Integrated Resource Plans  
Renewable Resource Programs  
Demand Side Resource Programs  
Determining the Financial Impact of Demand Side Resource Programs  
Feed-in-Tariffs  
Special Riders and Cost Recovery Mechanisms  
Decoupling vs. Lost Revenue Adjustments  
Renewable Energy, Distributed Generation (DG) & Net Metering  
The Process and Procedures of a Rate Case

### **Telecommunications Industry Presentations at the Center for Public Utilities**

The Basics of Inter-carrier Compensation Cost Models  
How to Test for Predatory Pricing  
Federal Act of 1996 Pricing Methods – Total Element Long Run Incremental Cost (TELRIC)  
Hands-on Problem for How to Calculate a TELRIC Price  
The Process of Determining The Need For Additional Area Codes  
How the E-911 System Operates  
What Are N11 Codes?  
The Relationship of Telecommunications Technology, Regulation and Pricing

### **Other Regulatory Presentations of Mr. Steele**

Methods for Determining The Cost of Equity  
Cost of Capital Issues

UE 374

EXHIBIT A

SBUA Proposed Budget for Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	30	240	7200
Attorney	20	205	4100
Administrator/paralegal	15	75	1125
Expert Witness Fees	110	150	16,500
Executive Director	6	250	1500
<i>Other Expenses</i>			
Travel – Expert			2000
Other			300
Printing and Postage			50
Subtotal			22,775
20% of SBUA Funded Expenditures			4,555
Total SBUA PacifiCorp Issue Fund Grant Proposed Request			18,220
Total SBUA Issue Fund Request			18,220