BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

AR 676

In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Rulemaking to Establish Multi-Year Plan Framework (HB 3179 and SB 688).	)	CUB REQUEST FOR ISSUE FUND GRANTS & PROPOSED BUDGET

The Oregon Citizens' Utility Board ("CUB") requests a grant of $24,000 total from the 2026 PACIFICORP ("PAC"), AVISTA, NORTHWEST NATURAL GAS CORPORATION ("NW Natural") and IDAHO POWER COMPANY ("IPC") Issue Funds, $6,000.00 per utility.[1] CUB has been tracking its participation in this docket by hours and activity.

CUB is pre-certified per OAR 860-001-0120(3)(a). AR 676 is an eligible proceeding under the Fifth Intervenor Funding Agreement ("IFA"), approved by the Oregon Public Utility Commission in Order No. 22-506, entered December 29, 2022, for PAC, Avista and NW Natural and the Intervenor Funding Agreement ("IDFA"), approved by the Oregon Public Utility Commission in Order No. 26-032, entered February 3, 2026, for IPC.

The proceeding directly affects PAC, AVISTA, NW Natural and IPC, which are participating public utilities under the IFA and the IDFA. *See* IFA at Article 1(k) and IDFA at Article 1(h).

The IFA defines an Eligible Proceeding for Issue Funds as including "any other

[1] Note that while Portland General Electric (PGE) and Cascade Natural Gas are also participating utilities in AR 676 there are no intervenor funds remaining for these two utilities for CUB to request.

proceeding designated by the Commission that directly affects one or more of the Participating Utilities and is anticipated to . . . (4) raise novel questions of law" IFA, Article 1(e)(v). AR 676 is a Rulemaking docket to Establish Multi-Year Plan Framework, thus, an Issue Fund Grant may be made for this proceeding under Article 6.1 of the IFA. Further, the Commission approved CUB's Motion to Make Eligible for Issue Fund Grant in this docket in Order No. 26-067, on March 10, 2026.

The IDFA defines an eligible proceeding for issue funds as "any Commission proceeding that directly affects Idaho Power including but not limited to, rulemaking proceedings, declaratory ruling proceedings and contested case proceedings" IDFA, Article 1(b). Therefore, an Issue Fund Grant may also be made for this proceeding under the IDFA.

Article 6.2 of the IFA and the IDFA requires an intervenor seeking an Issue Fund Grant to file a Notice of Intent to Request an Issue Fund Grant. CUB filed its Notice of Intent to Request an Issue Fund Grant on March 3, 2026.

Article 6.3 of the IFA and the IDFA requires an intervenor seeking and Issue Fund Grant to file a proposed budget within 30 days after the prehearing conference at which the schedule for the proceeding is established, however this rulemaking docket is being implemented in phases, which is distinct from a typical proceeding. We understand then that a budget request should follow the timing of these phases. The parties to AR 676 have ended Phase 1 of this docket and now started on Phase 2. Accordingly, this budget proposed in this filing is intended to cover work done in Phase 2 of this docket.

Pursuant to paragraph 6.3 of the IFA and the IDFA, 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 will review reports and all other filings. We will participate in this Rulemaking to Establish Multi-Year Plan Framework (HB 3179 and SB 688) through attending and contributing to scheduled workshops, as well as submitting Comments throughout the process.

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

i. Review all reports and presentations, as well as participating in all workshops, meetings and submitting comments related to each of the four Phase 2 tracks: treatment of cost categories, MRP methodologies and approaches, Performance Incentive Mechanisms and the logistics of multi-year rate plans.

a. Track 1will focus on:

i. Operation and management costs (O&M),
ii. Distribution Capital for each industry
iii. Other Cost Categories, such as transmission, generation and storage and decommissioning;
iv. Implementation Considerations for Each Cost Type and
v. Capitalization / Total expenditure accounting, including whether this method should be used for MRPs, any related legal concerns and identification of other methods that can reach similar goals.

b. Track 2: MRP Methodologies and Approaches

i. Including whether an element is applied to all MRPs, only one industry, or only one utility; Adjustment Factors; Decoupling; whether to establish an Efficiency Carryover Mechanism; Earning Sharing Mechanism.

c. Track 3. Performance Incentive Mechanisms (PIMs), more specifically, metrics and thresholds, by PIM area, such as backstop and outcome PIMS.

d. Track 4. MRP Logistics, including procedural and content requirements for filing and reviewing an MRP, and the timeline in which to do so. We will also participate in discussions and analysis of ongoing adjustment

processes, such as annual index adjustments, PIM measurement and monitoring, and other filings between MRP filings.

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

CUB represents the interests of PAC, Avista, NW Natural and IPC residential customers, though other customer classes may benefit from many aspects of our participation.

(d) The Funds from Which CUB Seeks Issue Fund Grants & Available Funds: CUB is seeking a $24,000.00 grant in total, $6,000.00 from the 2026 PAC Issue Fund, $6,000.00 from the 2026 Avista Issue Fund, $6,000.00 from the NW Natural Issue Fund and $6,000.00 from the 2026 IPC Issue Fund. CUB respectfully requests that the Commission approve CUB's request for a $24,000.00 total grant from the 2026 PAC, Avista, NW Natural and IPC Issue Funds.

(e) The Budget Showing Estimated Fees and Costs: CUB's budget accompanies this document as Attachment A. The proposed budget for this docket is $24,000.00. Estimated fees, before the application of matching funds, is currently estimated to be $32,050.00.

(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 23rd day of September, 2026.

Respectfully submitted,

/s/ Bob Jenks

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