

Randall C. Budge, ISB No. 1949
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PUBLIC UTILITIES COMMISSION

Attorneys for Intervenor
Idaho Irrigation Pumpers Association, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
IDAHO POWER COMPANY FOR AUTHORITY) **CASE NO. IPC-E-03-13**
TO INCREASE ITS INTERIM AND BASE)
RATES AND CHARGES FOR ELECTRIC)
SERVICE.)
_____)

**APPLICATION FOR INTERVENOR FUNDING OF
THE IDAHO IRRIGATION PUMPERS ASSOCIATION, INC.**

COMES NOW the Idaho Irrigation Pumpers Association, Inc. ("Irrigators"), by and through counsel of record, Randall C. Budge, and hereby respectfully makes application to the Idaho Public Utilities Commission ("Commission") for intervenor funding pursuant to Idaho Code § 61-617A and IDAPA 31.01.01.161 through .165 as follows:

(A) A summary of the expenses that the Irrigators request to recover broken down into legal fees, consultant fees and other costs and expenses is set forth in Exhibit "A" attached hereto and incorporated by reference. Itemized statements are also included as Attachments 1 and 2 to Exhibit "A" in support of said summary and are incorporated by reference.

(B) The detail of the Irrigators' proposed findings and recommendations are set forth in the Direct and Rebuttal Testimony of witness Anthony J. Yankel and the Irrigators' Post-Hearing Brief filed herein which are incorporated by reference.

(C) The expenses and costs incurred by the Irrigators set forth in Exhibit A and accompanying attachments are reasonable in amount and were necessarily incurred in reviewing and evaluating Idaho Power's Application, Testimony and Exhibits, conducting discovery, analyzing the Company's filing and supporting data, documents and studies, preparing testimony, evaluating the testimony, exhibits and positions of Staff and Interventors and participating in all proceedings and hearings and a filing Post-Hearing Brief, in addition to normal client communications regarding the same.

(D) The costs described in (A) above constitute a financial hardship for the Irrigators. The Irrigators currently have \$59,752.81 in the bank, accounts payable for legal and consultant fees in this case of \$75,554.40 as a result of participation in this case as set out in Exhibit "A", none of which have been paid; and, \$7,253.35 in other accounts payable. The Irrigators are an Idaho nonprofit corporation qualified under I.R.C. § 501(c)(5) representing farm interests in electric utility rate matters affecting farmers in southern and central Idaho. The Irrigators rely solely upon dues and contributions voluntarily paid by members, together with intervenor funding to support activities and participate in rate cases. Each year a mailing is sent to approximately 7500 Idaho Irrigators (approximately two-thirds in the Idaho Power Company service area and one-third in the Utah Power Company service area), soliciting annual dues. The Irrigators recommend members make a voluntary contributions based on acres irrigated or horsepower per pump.. Member contributions have been falling which are believed to be attributable to the depressed agricultural economy and

increased operating costs and threats, particularly those relating to water right protection issues. From member contributions the Irrigators must pay all expenses, which generally include mailing expenses, meeting expenses and shared office space in Boise, Idaho, in addition to the expenses relating to participation in rate cases. The Executive Director, Lynn Tominaga, is the only part-time paid employee, receiving a retainer plus expenses for office space, office equipment, and secretarial services. Officers and directors are elected annually and serve without compensation.

It has been and continues to be a financial hardship for the Irrigators to fully participate in all rate matters affecting its members. As a result of financial constraints, participation in past rate cases and in this case has been selective and, primarily, on a limited basis.

(E) The Irrigators' positions differed materially from the positions taken by the Commission Staff. For example, the Irrigators extensively analyzed and criticized the data and methodologies used by the Company for purposes of its cost of service study. For the most part, Staff did not extensively analyze or criticize the data or methodologies, excepting the Company's cost of service study results. Additionally, the Irrigators requested that any rate increase be spread on an even percentage basis and that a separate proceeding be initiated to thoroughly investigate and study data and cost of service issues. The Staff, on the other hand, supported a move of the Irrigation class towards cost of service with a 15 percent cap.

(F) The Irrigators' participation addressed issues of concern to the general body of users or consumers on Idaho Power's system. While all other Intervenors generally accepted the Company's data and methodologies used for cost of service purposes, the Irrigators did not. The Irrigators scrutinized and criticized the Company's data and methodologies, as well as the results. Particularly, the Irrigators challenged the source and validity of the weighting factors in the

Company's W12CP. Additionally, the Irrigators scrutinized and criticized the Company's actual and budgeted non-power cost accounts 500-953 expenses, concluding that expense data in the 2003 test year were excessive, supporting at least a \$5.8 million expense reduction which, if accepted, would be of benefit to all ratepayers. The Irrigators also placed emphasis on factors other than cost of service studies that should be considered by the Commission in setting rates. The Irrigators presented a different perspective on the so-called "irrigation subsidy" to that presented by all other Intervenors.

(G) The Irrigators represent the irrigation class of customers under Schedule 24.

Based on the foregoing, it is respectfully submitted that the Irrigators are a qualifying intervenor and should be entitled to an award of costs of intervention pursuant to Idaho Code § 61-617A and IDAPA 31.01.01.161 through .165.

DATED this 22nd day of April, 2004.

RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED

By Randall C. Budge
RANDALL C. BUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2³rd day of April, 2004, I mailed a true and complete copy of the foregoing document, postage prepaid, to each of the following:

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Monica B. Moen
Idaho Power Company
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mmoen@idahopower.com

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RANDALL C. BUDGE

EXHIBIT A

SUMMARY OF EXPENSES INCURRED BY IRRIGATORS
IN CASE NO. IPC-E-03-13

1.	Legal Fees:		
	Randall C. Budge:	157.80 hours at \$175 =	\$27,615
	Other Attorneys:	2.9 hours	\$ 415
	Paralegal:	5 hours at \$55 =	\$ <u>275</u>
	Total:		\$28,305
	Costs:		
	Extraordinary postage and copying, long distance phone:		\$ 1,057.70
	Travel:		\$ 180.00
	Lodging and Meals:		\$ <u>901.26</u>
	Total Work and Costs:		\$30,444.46
2.	Consultant Anthony J. Yankel		
	439 hours at \$100 per hour		\$43,900
	Expenses:		
	Travel, room and meals		\$ <u>1,209.94</u>
	TOTAL FEES AND EXPENSES:		\$75,554.40

ATTACHMENT 1

**ITEMIZED STATEMENT FOR
LEGAL FEES AND COSTS**

LAW OFFICES OF
 RACINE, OLSON, NYE, BUDGE & BAILEY
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 TELEPHONE (208) 232-6101
 TAX I.D. #82-0316387

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IDAHO IRRIGATION PUMPERS ASSOCIATION
 C/O LYNN TOMINAGA, EXEC. DIR.
 IDAHO WATER POLICY GROUP
 PO BOX 2624
 BOISE ID 83701-2624

04/22/2004
 ACCOUNT NO: 710-1518521M

IDAHO POWER 2003 GENERAL RATE CASE
 (IPC-E-03-13)

DRAFT STATEMENT

		HOURS	
11/07/2003	RCB REVIEW AND EVALUATE IPCO GENERAL RATE CASE FILING AND REQUEST FOR INTERIM RELIEF; TELEPHONE CONFERENCE WITH IPCO RE: INTERIM RELIEF REQUEST AND SERVICE OF FILING ON T. YANKEL, HANDLING OF DISCOVERY REQUESTS; TELEPHONE CONFERENCE WITH STAFF RE: SCHEDULING CONFERENCE AND HEARING ON INTERIM RELIEF REQUEST (REQUEST FOR PHONE PARTICIPATION)	2.00	350.00
11/13/2003	RCB REVIEW IPCO, ICIP, STAFF BRIEFS RE: INTERIM INCREASE REQUEST	1.00	175.00
	RCB PUBLIC UTILITIES HEARING ON INTERIM RATE INCREASE, CASE SCHEDULING CONFERENCE; LETTER TO BOARD OF DIRECTORS- CASE STATUS REPORT AND STRATEGY	2.00	350.00
	ELO PARTICIPATE IN MOTION AND SCHEDULING CONFERENCE FOR IDAHO POWER'S RATE CASE FILING	1.00	175.00
12/01/2003	RCB TELEPHONE CONFERENCE WITH T. YANKEL RE: DISCOVERY REQUESTS; PREPARE SERVE FIRST DISCOVERY REQUESTS UPON IPCO	1.00	175.00
12/02/2003	RCB REVISE AND EDIT FILE IIPA FIRST REQUEST FOR PRODUCTION OF DOCUMENTS; TELEPHONE CONFERENCE WITH R. LOBB RE: STAFF REVIEW		

IDAHO IRRIGATION PUMPERS ASSOCIATION

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04/22/2004
ACCOUNT NO: 710-1518521M

IDAHO POWER 2003 GENERAL RATE CASE
(IPC-E-03-13)

		HOURS	
	OF RATE CASE FILING AND ISSUES; TELEPHONE CONFERENCE WITH T. YANKEL RE: CASE ISSUES REVIEW/ ANALYSIS; REVIEW IPCO TESTIMONY/EXHIBITS	2.20	385.00
12/03/2003	RCB MEETING WITH IIPA BOARD RE: CASE REVIEW, ISSUES, STRATEGY	3.00	525.00
12/15/2003	RCB TELEPHONE CONFERENCE WITH T. YANKEL RE: PROPOSED SECOND DISCOVERY REQUESTS TO IPCO; PREPARE FILE IIPA SECOND DISCOVERY REQUESTS	1.60	280.00
12/16/2003	RCB TELEPHONE CONFERENCE WITH T. YANKEL RE: DEVELOPMENT OF LOAD CONTROL PROGRAM AND CREDIT PROPOSAL, ISSUES RELATING TO IPCO COST OF SERVICE STUDY EVALUATION; REVIEW AND EVALUATE PACIFICORP LOAD CONTROL PROGRAM (PAC-E-01-04) AND ADAPTABILITY TO IPCO; MEETING WITH M. MICKELSON RE: PROPOSED IPCO LOAD CONTROL PROGRAM	0.80	140.00
12/17/2003	RCB LETTER TO BOARD PROVIDING CASE STATUS/STRATEGY REPORT	0.30	52.50
12/26/2003	RCB RECEIVE AND REVIEW IPUC ORDER RE: PUBLIC WORKSHOPS; LETTER TO CLIENT RE: SAME; PREPARE THIRD IIPA DISCOVERY REQUESTS AND TELEPHONE CONFERENCE WITH T. YANKEL RE: SAME	0.80	140.00
12/30/2003	RCB TELEPHONE CONFERENCE WITH R. GAIL, M. BRILLS RE: PROPOSED IRRIGATOR LOAD CURTAILMENT PROGRAM PROPOSAL	0.50	87.50
	RCB PREPARE FILE AND SERVE IIPA FOURTH DATA REQUESTS; RECEIVE AND REVIEW IPCO DATA RESPONSES TO IIPA, STAFF	1.60	280.00

IDAHO POWER 2003 GENERAL RATE CASE
(IPC-E-03-13)

		HOURS	
01/02/2004	RCB	TELEPHONE CONFERENCE WITH T. YANKEL RE: IIPA DATA REQUESTS AND RESPONSES, PROPOSED LOAD CONTROL PROGRAM FOR IPCO	0.30 52.50
01/12/2004	RCB	TELEPHONE CONFERENCE WITH H. HUYSER RE: IPCO PROPOSED IRRIGATION CURTAILMENT PILOT PROGRAM	0.20 35.00
01/16/2004	RCB	RECEIVE AND REVIEW IPCO DISCOVERY RESPONSES (IRRIGATORS, MICRON, STAFF); RECEIVE AND REVIEW IPCO PROPOSED PROTECTIVE AGREEMENT FOR CONFIDENTIAL DISCOVERY RESPONSES; TELEPHONE CONFERENCE WITH AND FAX LETTER TO T. YANKEL, B. KLINE PROTECTIVE AGREEMENT	1.20 210.00
01/20/2004	RCB	TELEPHONE CONFERENCE WITH T. YANKEL RE: CASE PREPARATION AND DISCOVERY REQUESTS; PREPARE FILE IIPA FIFTH DISCOVERY REQUESTS TO IPCO; RECEIVE AND REVIEW IPCO RESPONSES TO FEDERAL AGENCIES DISCOVERY REQUESTS	1.40 245.00
01/22/2004	RCB	REVIEW TESTIMONY OUTLINE AND ROUGH DRAFT TESTIMONY OF T. YANKEL; TELEPHONE CONFERENCE WITH T. YANKEL RE: DRAFT TESTIMONY, IPCO DISCOVERY RESPONSES, LOAD RESEARCH DATA QUESTIONS	0.50 87.50
01/23/2004	RCB	PREPARE FILE IIPA SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS; REVIEW YANKEL TESTIMONY OUTLINE AND DRAFT TESTIMONY; TELEPHONE CONFERENCE WITH T. YANKEL RE: SAME	1.40 245.00
01/30/2004	RCB	TELEPHONE CONFERENCE WITH L. TOMINAGA RE: CASE STATUS/ STRATEGY, SCHEDULING PUBLIC HEARINGS	0.20 35.00

IDAHO POWER 2003 GENERAL RATE CASE
(IPC-E-03-13)

		HOURS	
02/17/2004	RCB	REVIEW, REVISE AND EDIT DRAFT TESTIMONY AND EXHIBITS OF T. YANKEL	2.00 350.00
02/18/2004	RCB	REVIEW, REVISE AND EDIT DRAFT TESTIMONY AND EXHIBITS OF T. YANKEL	6.50 1,137.50
02/19/2004	RCB	MULTIPLE TELEPHONE CONFERENCE AND EMAILS WITH T. YANKEL RE: TESTIMONY AND EXHIBITS; FINAL REVIEW, REVISION, EDIT, AND FILING OF T. YANKEL TESTIMONY AND EXHIBITS; TELEPHONE CONFERENCE WITH L. TOMINAGA RE: IIPA TESTIMONY AND PUBLIC HEARING SCHEDULE	4.00 700.00
02/21/2004	RCB	RECEIVE AND PRELIMINARY REVIEW OF DIRECT TESTIMONY OF STAFF AND INTERVENORS; LETTER TO BOARD RE: REPORT OF T. YANKEL AND OTHER TESTIMONY, CASE STATUS REPORT	1.80 315.00
02/23/2004	ELO	REVIEW YANKEL DIRECT TESTIMONY	0.80 n/c
02/24/2004	ELO	TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: IRRIGATOR TESTIMONY AT PUBLIC HEARINGS	0.30 52.50
02/28/2004	RCB	RECEIVE AND REVIEW IPCO DISCOVERY REQUESTS TO IIPS, OTHER INTERVENORS; TELEPHONE CONFERENCE WITH T. YANKEL RE: DISCOVERY RESPONSES	0.30 52.50
03/01/2004	RCB	RECEIVE AND REVIEW IPCO DISCOVERY REQUESTS TO IIPA, OTHER INTERVENORS; TELEPHONE CONFERENCE WITH T. YANKEL RE: IIPA RESPONSES TO IPCO DISCOVERY REQUESTS, IIPA REBUTTAL TESTIMONY; TELEPHONE CONFERENCE WITH STAFF RE:	

IDAHO POWER 2003 GENERAL RATE CASE
(IPC-E-03-13)

		HOURS	
	SCHEDULING ISSUES	0.80	140.00
03/02/2004	ELO TELEPHONE CONFERENCE WITH KEVIN MICHAELSON RE: TESTIFYING AT UPCOMING PUBLIC MEETINGS FOR IDAHO POWER RATE CASE; CONFERENCE WITH RCB RE: SAME AND TYPE OF TESTIMONY THAT WOULD BE USEFUL AT PUBLIC MEETINGS	0.30	45.00
03/03/2004	RCB TELEPHONE CONFERENCE WITH STAFF, T. YANKEL RE: SCHEDULING WITNESSES FOR HEARING	0.30	52.50
03/08/2004	RCB REVIEW, REVISE AND EDIT T. YANKEL REBUTTAL TESTIMONY AND EXHIBITS; TELEPHONE CONFERENCE AND LETTER TO T. YANKEL WITH PROPOSED REVISIONS TO TESTIMONY	1.20	210.00
03/12/2004	RCB PREPARE, REVISE AND EDIT FINAL YANKEL REBUTTAL TESTIMONY AND EXHIBITS; LETTER TO PUC AND PARTIES WITH REBUTTAL TESTIMONY FILING; TELEPHONE CONFERENCE WITH T. YANKEL RE: REBUTTAL TESTIMONY AND RESPONSE TO IPCO DISCOVERY REQUESTS; LETTER TO IIPA OFFICERS, BOARD RE: REBUTTAL TESTIMONY, CASE STATUS; MEETING WITH J. GEHRING RE: SUBMITTING PUBLIC TESTIMONY ETC.	2.20	385.00
03/15/2004	RLR PREPARE RESPONSE TO INTERROGATORIES AND PRODUCTION REQUEST FROM IPCO FOR MEETING	2.50	137.50
	RLR PREPARE REBUTTAL TESTIMONY FOR SERVICE/ MAILING	2.50	137.50
03/16/2004	RCB FINALIZE AND FILE T. YANKEL REBUTTAL TESTIMONY AND EXHIBITS; PREPARE AND SERVE IIPA RESPONSES TO IPCO DISCOVERY RESPONSES	2.40	420.00

IDAHO POWER 2003 GENERAL RATE CASE
(IPC-E-03-13)

		HOURS	
03/18/2004	RCB	REVIEW TESTIMONY AND EXHIBITS OF IPCO WITNESSES AND PREPARE FOR HEARING	2.40 420.00
03/19/2004	RCB	REVIEW TESTIMONY AND EXHIBITS OF IPCO WITNESSES AND PREPARE FOR HEARING	2.00 350.00
03/20/2004	RCB	REVIEW TESTIMONY AND EXHIBITS OF IPCO WITNESSES AND PREPARE FOR HEARING	4.50 787.50
03/22/2004	RCB	REVIEW IPCO, STAFF TESTIMONY AND EXHIBITS AND PREPARE FOR RATE CASE	3.00 525.00
03/23/2004	RCB	REVIEW IPCO, STAFF TESTIMONY AND EXHIBITS AND PREPARE FOR RATE CASE HEARINGS	3.40 595.00
03/24/2004	RCB	REVIEW TESTIMONY OF STAFF AND INTERVENORS AND PREPARE FOR PUC HEARING	4.50 787.50
03/25/2004	RCB	REVIEW STAFF AND INTERVENOR TESTIMONY AND PREPARE FOR PUC HEARINGS	2.60 455.00
03/26/2004	RCB	REVIEW REBUTTAL TESTIMONY OF IPCO, STAFF, INTERVENORS AND PREPARE FOR PUC HEARINGS	3.80 665.00
03/27/2004	RCB	REVIEW IPCO, INTERVENOR REBUTTAL TESTIMONY AND PREPARE FOR PUC HEARINGS; MULTIPLE EMAIL AND TELEPHONE CONFERENCE WITH T. YANKEL RE: CASE PREPARATION/ STRATEGY AND WITNESS CROSS-EXAMINATION	5.50 962.50
03/28/2004	RCB	REVIEW IPCO, INTERVENOR REBUTTAL TESTIMONY AND PREPARE FOR PUC HEARINGS;	

IDAHO POWER 2003 GENERAL RATE CASE
 (IPC-E-03-13)

		HOURS	
	TELEPHONE CONFERENCE WITH T. YANKEL RE: HEARING PREPARATION/ STRATEGY AND WITNESS CROSS EXAMINATION	6.00	1,050.00
RCB	TRAVEL TO BOISE	3.00	525.00
03/29/2004			
RCB	PREPARE FOR AND ATTEND PUC HEARINGS	11.00	1,925.00
03/30/2004			
RCB	PREPARE FOR AND ATTEND PUC HEARINGS	10.50	1,837.50
03/31/2004			
LRT	TELEPHONE CONFERENCE WITH RANDY RE: RESEARCH ON THE COST OF SERVICE ANALYSIS	0.10	11.00
RCB	PREPARE FOR AND ATTEND PUC HEARINGS	10.00	1,750.00
04/01/2004			
LRT	RESEARCH CASES ADDRESSING COST OF SERVICE ANALYSIS; PUC CASES APPLYING OTHER FACTORS, AND DISCRIMINATORY CHARGES TO NEW CUSTOMERS FOR COSTS OF PROVIDING THEM SERVICE	1.20	132.00
RCB	PREPARE FOR AND ATTEND PUC HEARINGS	9.00	1,575.00
04/02/2004			
RCB	PREPARE FOR PUC HEARINGS; PREPARE DRAFT POST-HEARING BRIEF	5.50	962.50
04/03/2004			
RCB	PREPARE DRAFT POST-HEARING BRIEF	4.00	700.00
04/04/2004			
RCB	PREPARE DRAFT POST-HEARING BRIEF; PREPARE PUC HEARING	3.50	612.50
04/05/2004			
RCB	PREPARE FOR AND ATTEND PUC HEARING	8.00	1,400.00
04/06/2004			
RCB	MEETING WITH EXECUTIVE DIRECTOR L. TOMINAGA RE: CASE REPORT; MULTIPLE TELEPHONE CONFERENCES AND LETTERS TO BOARD RE: CASE REPORT	2.80	490.00
RCB	TRAVEL	3.50	612.50

IDAHO POWER 2003 GENERAL RATE CASE
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		HOURS	
04/07/2004	RCB MULTIPLE LETTER TO IIPA BOARD MEMBERS, OTHERS RE: RATE CASE HEARING OUTCOME, ISSUES AND STRATEGIES; PREPARE, REVISE AND EDIT POST-HEARING BRIEF	1.80	315.00
04/14/2004	RCB PREPARE, REVISE AND EDIT IRRIGATORS POST-HEARING BRIEF; TELEPHONE CONFERENCE WITH AND LETTER TO T. YANKEL WITH PROPOSED BRIEF	1.50	262.50
04/15/2004	RCB TELEPHONE CONFERENCE WITH T. YANKEL RE: POST-TRIAL BRIEF, INTERVENOR FUNDING APPLICATION	0.30	52.50
04/21/2004	RCB PREPARE, REVISE AND EDIT IIPA POST HEARING BRIEF AND APPLICATION FOR INTERVENOR FUNDING	2.20	385.00
	FOR CURRENT SERVICES RENDERED	165.70	28,305.50

RECAPITULATION _____

<u>ATTORNEY</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
LISA TANNER	1.30	\$110.00	\$143.00
ROBIN L. ROEBUCK	5.00	55.00	275.00
RANDALL C. BUDGE	157.80	175.00	27,615.00
ERIC L. OLSEN	1.60	170.31	272.50

12/18/2003	POSTAGE	12.43
12/31/2003	LONG DISTANCE TELEPHONE EXPENSE	5.82
01/08/2004	POSTAGE	12.43
01/30/2004	POSTAGE	13.06
01/31/2004	LONG DISTANCE TELEPHONE EXPENSE	1.45
02/19/2004	PHOTOCOPIES - YANKEL TESTIMONY, EXHIBITS	183.00
02/19/2004	COPY CD'S - YANKEL WORK PAPERS	9.00
02/26/2004	POSTAGE	230.23
02/29/2004	LONG DISTANCE TELEPHONE EXPENSE	3.20

IDAHO IRRIGATION PUMPERS ASSOCIATION

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ACCOUNT NO: 710-1518521M

IDAHO POWER 2003 GENERAL RATE CASE
(IPC-E-03-13)

03/25/2004 POSTAGE	500.39
03/31/2004 LONG DISTANCE TELEPHONE EXPENSE	39.40
04/01/2004 POSTAGE	10.00
04/06/2004 RT MILEAGE POCATELLO- BOISE 3/28-4/6	180.00
04/06/2004 LODGING IN BOISE 3/28-4/6	663.04
04/06/2004 MEALS IN BOISE 3/28-4/6	238.22
TOTAL COSTS	<u>2,138.96</u>
TOTAL CURRENT WORK & COSTS	30,444.46
BALANCE DUE	<u>\$30,444.46</u>

ATTACHMENT 2

**ITEMIZED STATEMENT FOR
CONSULTANT FEES AND COSTS**

<u>Date</u>	<u>IPCo filings</u>	<u>Description</u>
Nov. 12	1	Read Idaho Power's application and request of interim relief in order to get an overview of the issues in the case.
21	1	Read testimony of Keen in order to get a good background of where the Company was coming from in this case.
24	6	Read testimony and exhibits of Smith and Obenchain. Develop a general feel for how this revenue requirement testimony impacts all customers.
25	6	Develop possible areas of concern regarding expense categories used in filing, compare with FERC Form 1 data; develop interrogatories designed to follow-up on what was requested in the last case as well as get additional data and clarification in this case.
26	6	Review Brilz testimony and exhibits. Check with past cases and past Commission decisions for consistency. Check for changes in testimony and areas where we had previous disagreement.
28	6	Review Brilz testimony and exhibits. Check with past cases and past Commission decisions for consistency. Check for changes in testimony and areas where we had previous disagreement.
Dec. 1	7	Read remainder of testimony; review all data responses to Staff' first and second set of discovery; conversation regarding direction with Hessing.
2	7	Look up data in various FERC Form 1's and use to develop a spreadsheet regarding historic expenses and check this data out in order to review trends that may exist from year to year.
4	5	Review past expense levels by FERC Account verse test year expenses for abnormalities. Review test year expenses by month as opposed to by year to see the changes on a monthly basis.
8	4	Check for consistency and reliability of the data provided by Idaho Power on CD that supports various aspects of company filing.
11	4	Review Idaho Power's cost of service study to follow how allocators impact the calculations and how these impacts are carried throughout the cost-of-service study.

<u>Date</u>	<u>IPCo filings</u>	<u>Description</u>	
12	5	Review IPCo cost of service study to follow how allocators work; see if allocators are consistent with what would expect if one were going to treat these customers as interruptible or place a demand value on these	
15	7	Review cost of service study to follow how allocators work; check calculations for precision and to better understand what the Company is basing its case upon. Develop interrogatories in order to clarify various points or in order to demonstrate an alternative approach.	
16	5	Review Idaho Power workpapers regarding the development of allocation factors for distribution plant and A&G expenses.	
17	8	Review Idaho Power's cost of service study in paper form as well as electronic form and backup workpapers.	
23	8	Review weather normalization equations and data supplied in response to a Staff data request and used by the Company in this filing as well as in past PCA cases.	
29	3	Review Brilz workpapers; develop an understanding of how various items were used to develop allocators or classification ratios. Write interrogatories regarding distribution allocators.	
30	3	Review Brilz workpapers; write interrogatories based on responses to data requests put in by the Staff.	
31	7	Review Brilz workpapers; develop and understanding of how various items were used to develop allocators or classification ratios. Write interrogatories regarding distribution allocators.	
Jan-04	5	Review data responses to Irrigation set 1; analyzes data regarding individual subaccounts between FERC Acct. 500 and Acct. 935. Develop graphs and do trend analysis on individual accounts.	
	6	8	Review data responses to Irrigation set 1; analyzes data regarding individual subaccounts between FERC Acct. 500 and Acct. 935. Develop graphs and do trend analysis on individual accounts.
	7	4	Review data responses to Irrigation set 1; analyzes data regarding individual subaccounts between FERC Acct. 500 and Acct. 935. Develop graphs and do trend analysis on individual accounts.

<u>Date</u>	<u>IPCo filings</u>	<u>Description</u>
8	8	Review data responses to Irrigation set 1; analyzes data regarding individual subaccounts between FERC Acct. 500 and Acct. 935. Develop graphs and do trend analysis on individual accounts.
9	7	Review data responses to Irrigation set 1; analyzes data regarding individual subaccounts between FERC Acct. 500 and Acct. 935. Develop graphs and do trend analysis on individual accounts.
12	5	In order to define demand costs, review Pacificorp's proposed charges for next year's interruptions. Review how load research data is developed based upon individual samples by hour.
13	8	Review, where possible, the detailed load research data and how the summary data was developed. Then review how load research data is brought forward into rate case.
14	7	Try to establish a means of normalizing demand values to be in line with normalized energy values and review alternative proposals regarding how to utilize load research data using normalized sales levels.
15	3	Attempt to gather appropriate data so as to check impact of using normalized energy on the demand assigned to irrigation and residential using the companies ratio method.
16	8	Review cost-of-service data as it relates to distribution plan and the transfer of non-coincident peak data from load research data into the Company's filing as it is applied to explain cost causation on the
19	8	Write draft testimony and prepare various graphs regarding the normalization of the revenue requirement as it is associated with Account 500-935 expenses less fuel and purchase power expenses.
20	7	Review cost-of-service data; review basis for allocation factors including the establishment of weighting in the Company's 2002 IRP; review transfer of data from load research data into the Company's filing.
22	4	Review the equations and the transfer of data from load research data into the Company's filing and how similar data was treated in previous years based upon load research data.

<u>Date</u>	<u>IPCo filings</u>	<u>Description</u>	
23	8	maintenance and other aspects of the Company's operation impact generation and requirements and availability; develop graphs associated with peak demand and maintenance at time of peak; outline related testimony.	
26	8	Attempt to run Company's cost-of-service program; conversation with Staff regarding program problems; outline testimony regarding cost-of-	
27	8	Attempt to run Company's cost-of-service program; conversation with Staff regarding program problems; draft testimony regarding weighting factors for demand.	
28	4	Attempt to run Company's cost-of-service program; based upon the inconsistent results I get from the Company's study, begin to outline my own cost of service study program.	
Feb	2	8	Write my own cost of service study program.
	3	8	Write my own cost of service study program.
	4	8	Write my own cost of service study program.
	5	8	Write my own cost of service study program; verify results; begin using program as a comparison to the Company's
	6	8	Correct problems with Idaho Power's cost-of-service study program; begin to insert data that is different than used by the Company in its filed cost-of-service study.
	7	4	Review how Idaho Power uses its load research data to develop coincident demand values and then develop coincident demand allocators for various classes based upon normalized demand data.
	9	6	Write draft testimony regarding direction on rate design; look up rates paid in Utah by irrigators; obtain necessary information to support what has been going on in Utah.
	10	6	Review history of weighting factors and see how they impact this case differently than the last case; write testimony regarding use of marginal weighting factors for both energy and demand.

<u>Date</u>	<u>IPCo filings</u>	<u>Description</u>
11	6	Write draft testimony regarding normalized demand data, use of 12-CP allocation. Coordinate with development of exhibits and data used to establish normalized demands.
12	6	Review the Company's data responses regarding distribution cost classification/allocation and draft testimony regarding problems with distribution system and develop appropriate exhibits.
13	8	Finalize draft testimony; work on exhibits to insure that they are readable and make sense as well as convey the needed information.
14	6	Work on draft testimony, develop summary and some overview testimony of where I have gone in this case.
15	2	Review data supplied in my exhibits to insure that they were accurately developed.
16	8	Review data supplied in exhibits to insure accuracy; insure that testimony follows exhibit numbers and all documentation is presented or available.
17	8	Reread testimony; make corrections to testimony and exhibits; review discovery that came in as it may apply to my testimony of other issues of importance.
19	6	Review data response to data requests; reread testimony; make final corrections to testimony and exhibits.
20	2	Review testimony and exhibits of industrial intervenors regarding Danskin and rate design.
23	1	Review testimony of Hessing and see how the Company's model treats his assumptions.
24	2	Review Staff testimony of Shunke's regarding rate design as well as that of the DOE witness.
25	1	Review testimony of Micron witness Dr. Peseau.
26	4	Review testimony of Powers, do calculations on impacts to rates and rates of return based upon his suggestion that Irrigation rates be increased over equal amounts over the next five years.

<u>Date</u>	<u>IPCo filings</u>	<u>Description</u>
April 1	8	Work with Budge to prepare for cross-examination of Pescar and Power. Prepare to testify, attend hearing and testify.
2	8	Work with Budge on cross-examination of Brilz, Said, and Obinchain regarding their rebuttal testimony. Work with Budge regarding some direction on our brief. Work at the Commission to do research regarding material that could be used for cross-examination and for the brief.
3	8	Return trip; finalize review of the rebuttal of Brilz, Said, and Obenchain in preparation for cross-examination.
15	2	Coversation with Budge, review various aspect of the case and organize material to address Brief.
16	3	Work on rewriting Brief.