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IDAHO PUBLIC  
UTILITIES COMMISSION

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER )	
COMPANY'S PETITION TO INCREASE THE )	
PUBLISHED RATE ELIGIBILITY CAP FOR )	CASE NO. IPC-E-07-03
WIND POWERED SMALL POWER )	
PRODUCTION FACILITIES; AND )	
)	(Reference related cases
TO ELIMINATE THE 90%/110% )	PAC-E-07-07 and AVU-E-
PERFORMANCE BAND FOR WIND POWERED )	07-02)
SMALL POWER PRODUCTION FACILITIES )	
_____ )	

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**APPLICATION FOR INTERVENOR FUNDING**

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Pursuant to Idaho Code § 61-617A and Rules of Procedure 161 through 165, Renewable Northwest Project and NW Energy Coalition (the "Renewable Coalition") hereby apply for intervenor funding in this matter in the amount of \$24,559.78. This application is supported by the following Supporting Points and Authorities.

**SUPPORTING POINTS AND AUTHORITIES**

An award of intervenor funding in this matter is warranted under the criteria in Rule of Procedure 165. Both organizations composing the Renewable Coalition are non-profit organizations whose ability to participate in Commission proceedings in a meaningful way is limited by their modest staff and financial resources.

The Renewable Coalition's involvement in this case contributed materially to the resolution of this matter, including by resulting in the Settlement Stipulation now on file with the Commission. The issues addressed in this case by the Renewable Coalition were of general concern to Idaho Power customers. A grant of intervenor funding in this case is consistent with the intent of Idaho Code § 61-617A(1), which states: "It is hereby declared the policy of this state to encourage participation at all stages of all proceedings before the commission so that all affected customers receive full and fair representation in those proceedings."

**A. REQUIREMENTS OF RULES 162 AND 165 ARE MET**

The following information and statements fulfill the requirements of Rule of Procedure 162, and demonstrate that an award of intervenor funding is warranted under Rule 165:

1. Itemized list of expenses.

Intervenors incurred attorney fees for William M. Eddie in the amount of \$11,415.00. This amount reflects 76.1 hours at \$150 per hour. Mr. Eddie's itemized hourly records are attached hereto as Exhibit 1.

Intervenors incurred expert costs for Ken Dragoon of Renewable Northwest Project. Mr. Dragoon is an employee of Renewable Northwest Project, but acted as technical expert for both parties composing the Renewable Coalition. Mr. Dragoon's time is billed based on the estimated actual cost of his time (including apportioned amount of overhead costs) as a staff member of Renewable Northwest Project, for a final hourly rate of \$83.33. The total requested recovery for Mr. Dragoon's time is \$11,270.38. Mr. Dragoon's itemized hourly records are attached hereto as Exhibit 2.

In addition, the Coalition incurred the following costs for participation in this case and the related Avista matter (AVU-E-07-02):

- Airfare and other travel costs for Mr. Eddie: \$572.20
- Airfare, hotel, other travel costs for Mr. Dragoon: \$1,302.73
- Shipping and postage: \$147.26
- Copying charges: \$60.48

Total Costs = \$2,082.67<sup>1</sup>

Renewable Coalition requests recovery of 90% of these costs within this docket (\$1874.40), and 10% of costs (\$208.27) within the AVU-E-07-02 docket. Such sharing of costs between cases is roughly proportional to the hours incurred by Messrs. Eddie and Dragoon in the two cases. In addition, the Coalition incurred other minor copying, postal, and telecommunication expenses which are waived for purposes of this application.

**Total Fees and Costs Requested: \$24,559.78.**

2. Statement of proposed findings.

Intervenors propose the Commission adopt the following findings with respect to this case and this Application:

“The Commission grants the Joint Motion for Approval of Settlement Stipulation. The Commission adopts the adjustments to the contracting terms and avoided costs available to qualifying facilities less than 10aMW in size as set forth in the Stipulation.

In regard to the Application for Intervenor Funding, the Commission finds that the Renewable Coalition’s participation in this case

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<sup>1</sup> An itemized listing of costs can be provided on request.

materially contributed to Commission's decision in this matter. We find that the Renewable Coalition's requested award is reasonable in amount, and that the costs of intervention constituted a significant hardship for intervenors. Renewable Coalition addressed issues of concern to the general body of Idaho Power customers. Intervenor funding in the amount \$24,559.78 is awarded to Renewable Coalition, and shall be paid to Advocates for the West as counsel for both parties composing Renewable Coalition."

3. Statement showing costs are reasonable.

The costs for which recovery is requested are reasonable. This case involved complex and novel technical issues, and the proceedings included two public workshops and two settlement conferences. Renewable Coalition conducted written discovery, and expended many expert and attorney hours negotiating and drafting the Settlement Stipulation now presented to the Commission.

For attorney fees, Renewable Coalition seeks recovery at an hourly rate of \$150 per hour for Mr. Eddie's time. The Coalition submits this rate is commensurate with or below rates charged by other attorneys of similar experience practicing in a specialized area of law. The Commission has previously granted intervenor funding for Mr. Eddie's time at this requested rate. See Order Nos. 30215 and 30267. In Order No. 30035, the Commission recently approved rates of \$175 and \$185 per hour for more senior counsel than Mr. Eddie, as part of an intervenor funding request by the Idaho Irrigation Pumpers Association. In other litigation matters, Mr. Eddie typically bills his time at \$200 per hour and higher.

Mr. Eddie reviewed his time sheets in this case and redacted hours that were arguably duplicative or otherwise unnecessary. As reflected in the time sheets, Mr. Eddie expended nearly ninety (90) hours of time in this matter. For purposes of this Application, Renewable Coalition has reduced the number of hours for which recovery is requested by 15%. No recovery is requested for Mr. Eddie's time in preparing this Application. These hours and the other costs incurred by the Coalition were reasonably necessary for the Coalition's participation in this matter.<sup>2</sup>

Likewise, the hourly rate and total requested grant of Intervenor Funding for Mr. Dragoon's time is very reasonable. Mr. Dragoon's background was described in the Direct Testimony of Ken Dragoon, which was filed in support of the Joint Motion for Approval of Settlement Stipulation in this matter. Mr. Dragoon is a highly experienced technical expert in utility planning and system operations, and in particular has significant expertise in wind integration. Renewable Coalition believes his market rate as a technical consultant would be approximately \$250 per hour. The requested rate for recovery of \$83.33 is significantly below the market value of his services. Exhibit 3 (letter of Rachel Shimshak, executive director of RNP) is provided herewith in support of this Application.

The Commission has previously authorized recovery of intervenor funding in cases resolved via workshops and settlement conferences. See Order 30267 (authorizing \$8,342.10 in intervenor funding in fixed-cost adjustment docket); Order 30035 (authorizing \$32,742 in intervenor funding in Idaho Power's 2005 rate case, which was resolved through the Commission's approval of a stipulated settlement); and Order 29868 (authorizing \$17,500 in intervenor funding for workshop proceedings in cost of service docket).

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<sup>2</sup> Renewable Coalition is filing an Application for Intervenor Funding in the AVU-07-02 docket. The difference in requested amounts accurately reflects that negotiations and proceedings related to Idaho Power's application in this case occupied most of the parties' time.

4. Explanation of cost statement.

Payment of the requested costs would constitute a financial hardship for both organizations composing the Renewable Coalition. The NW Energy Coalition is a non-profit (IRS 501(c)(3)) organization with an annual budget of slightly more than \$600,000. With these limited resources to pay the salaries of eleven (11) staff members, plus overhead, the NW Energy Coalition seeks to influence energy policy decisions in the four (4) northwest states through participation at state, regional (e.g. Bonneville Power Administration) and national venues. NW Energy Coalition would not be able to pay the attorney fees and other costs incurred in this matter without suffering financial hardship.

Renewable Northwest Project is a non-profit (IRS 501(c)(3)) organization with a budget of approximately \$680,000. As further described in Exhibit 3, Renewable Northwest Project's commitment of resources to participate in this case constitutes a significant financial hardship for the organization.

5. Statement of difference.

The Renewable Coalition's participation in this matter differed materially from all other parties. Of all parties involved in this case, the Renewable Coalition was the most active non-utility party in seeking to identify and resolve issues through the public workshops and settlement conferences. The Renewable Coalition participated in this docket as a strong proponent for renewable energy, but not as a proponent for any particular renewable energy project. The Renewable Coalition's diverse combined membership required that the Coalition bring a unique and balanced perspective.

As described in the Direct Testimony of Ken Dragoon filed in support of the Settlement Stipulation in this case, the Renewable Coalition's perspective on the issue of wind integration

was to recognize that the most accurate wind integration cost estimate was to the advantage of all parties. Wind energy is a competitively priced resource with zero fuel costs that can be built with relatively short lead time at large scales. Wind energy will play a major role in utility resource portfolios over the next few decades. The Renewable Coalition advocated for a reasonable outcome that would balance the risks facing the wind industry, ratepayers, and utilities, while also setting a path forward to continue refining wind integration analyses.

The Renewable Coalition was the primary non-utility negotiator of the Settlement Stipulation now on the file with the Commission. As the Commission is aware, this was a relatively controversial docket with many contested issues.

6 & 7. Statements of recommendation and class.

NW Energy Coalition's membership includes individuals residing in Idaho and organizations such as Idaho Rivers United and Idaho Rural Council, and therefore the organization most directly represents the interests of residential and small commercial customers. However, in this case the Renewable Coalition's recommendations and positions focused on matters which impact all utility customers.

**CONCLUSION**

The Renewable Coalition respectfully requests that the foregoing Application for Award of Intervenor Funding be granted, and that Idaho Power pay \$24,559.78 to Advocates for the West as counsel for the Renewable Coalition for proper distribution.

Dated: October 25, 2007

Respectfully submitted,



William M. Eddie  
On behalf of RNP and NW Energy Coalition

## CERTIFICATE OF SERVICE

I hereby certify that on this 25<sup>TH</sup> day of October 2007, true and correct copies of the foregoing APPLICATION FOR INTERVENOR FUNDING were delivered to the following persons via overnight delivery (for the Commission) and U.S. Mail for all other recipients. Electronic copies also were provided on this date to all parties of record.

Jean Jewell (Original and 7 copies)  
Idaho Public Utilities Commission  
472 W. Washington St.  
Boise, ID 83702

Robert M. Ellis, Esq.  
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Seattle, W A 98109

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Monica Moen  
Idaho Power Company  
P.O. Box 70  
Boise, ID 83707-0070

Glenn Ikemoto  
Idaho Windfarms, LLC  
672 Blair Avenue  
Piedmont, CA 94611

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Deputy Attorney General  
Idaho Public Utilities Commission  
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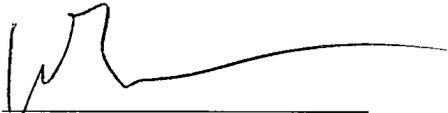
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Boise, ID 83702

Gerald Fleischman  
11535 W. Hazeldale Ct.  
Boise, ID 83713

Brian D. Jackson  
Renaissance Engineering & Design,  
2792 Desert Wind Rd.  
Oasis, ID 83647-5020

M. J. Humphries  
Blue Ribbon Energy, LLC  
2630 Central Ave.  
Idaho Falls, ID 83406

Gary Seifert  
Kurt Myers  
INL Biofuels & Renewable Energy  
Technologies  
PO Box 1625, MS 3810  
Idaho Falls, ID 83415-3810

A handwritten signature in black ink, appearing to read 'William M. Eddie', written over a horizontal line.

William M. Eddie

**IPC-E-07-03**

**APPLICATION FOR INTERVENOR FUNDING**

**EXHIBIT 1**

**Hours Expended by William M. Eddie**  
**IPC-E-07-03**

<u>Date</u>	<u>Service</u>	<u>Hours</u>
2/9/07	mtg w/ RNP re: IPC wind integration	1.3
2/13/07	emails w/ RNP, NWEAC on strategy, representation, next steps	0.6
2/14/07	tc w/ RNP, NWEAC re: next steps, strategy; emails w/ G.Ikemoto re: same	0.7
2/15/07	email w/ RNP, NWEAC about 3/15 wkshop, review N.McIntyre email re: wind study group	0.4
2/16/07	emails w/ RNP and draft email to IPC re: schedule for wkshops; tc w/ R.Gale re: same; email to RNP/NWEAC re: scheduling call	3.1
2/19/07	misc emails re: call w/ IPC to discuss peer review	0.2
2/21/07	misc emails w/ RNP, IPC re: workshops	0.3
2/22/07	review wind integration study and prep issues/questions list	1.8
2/23/07	mtg w/ G.Ikemoto, N.Mcintire re: wind study, strategy	1.2
2/26/07	prep for and attend teleconf w/ RNP and Idaho Power	1.1
2/28/07	tc w/ P.Richardson re: wind study; emails w/ RNP re: same	0.7
3/5/07	prepare petition to intervene; misc emails on 3/15 wkshop	1
3/12/07	review study and corresp b/tw RNP and IPC; prep issues list; mtg w/ K.Dragoon to prep for Thurs workshop	5
3/13/07	revise issues list; email to K.Dragoon re same; tc w/ B.Kline re: same	0.8
3/14/07	prep for mtg (review Dragoon memo)	1
3/15/07	attend wkshop; mtgs w/ K.Dragoon re: same	9
3/19/07	email w/ RNP re: status; email to G.Ikemoto re: settlement	0.6
3/21/07	tc w/ G.Ikemoto re: integration issues, data	0.4
3/23/07	mtg w/ RNP re: wind integration status, strategy; email to wind group re: same	1.9
3/26/07	misc emails w/ IPUC staff, RNP	0.3
4/4/07	review file and teleconf w/ K.Dragoon, R.Lobb, R.Sterling re: status, workshops, etc	1.5
4/24/07	tc w/ K.Dragoon re: IPC study status; email re: same to IPC	0.6
5/15/07	review staff comparison of filing; email w/ K.Dragoon re: scheduling	0.2
5/30/07	conf w/ K.Dragoon re: status of discussions w/ IPC; send email to IPC re: next wkshop	0.3
6/19/07	review IPC response to issues doc for 6/20 wkshop; tc w/ K.Dragoon re: same; review K.Dragoon ppt on up-reg only and email to K.Dragoon re: same	1.3

6/20/07	travel to and attend IPC PURPA wind integration wkshop	9
6/21/07	draft update email memo to RNP and NWECC on workshop, next steps, strategy; email w/ J.Carkulis re: workshop	1.4
7/3/07	draft settlement memo/proposal, email w/ T.Gagliano re: same	1.5
7/11/07	draft settlement memo/proposal	3.5
7/16/07	revise and edit settlement memo; email w/ K.Dragoon re: same	1.2
7/19/07	revise settlement memo; email to RNP and NWECC re: same	0.9
7/20/07	email to wind colleagues; tc w/ K.Dragoon re: settlement memo; email to G.Ikemoto, J.Carkulis re: settlement mtg	0.7
7/23/07	revise settlement memo; emails and tcs w/ K.Dragoon re: same; review avoided cost orders	1.4
7/24/07	tc w/ K.Dragoon re: settlement memo; email to developers re: status, etc	0.6
7/25/07	tc w/ K.Dragoon re: settlement conf; tc w/ J.Miller re: same	0.4
7/31/07	prep for and attend settlement conference; email update to clients	7
8/1/07	email w/ K.Dragoon re: settlement proposals	0.3
8/9/07	teleconf w/ wind developers, RNP, others to discuss settlement	2.2
8/10/07	travel and attend settlement conf in Boise; tc w/ N.Hirsh re: same	6.5
8/16/07	draft email to clients re: staff proposed procedure	0.2
8/23/07	email to B.Kline re: procedure, production requests, etc	0.3
8/25/07	draft production requests; email to K.Dragoon re: same	1.5
8/28/07	tc and email w/ K.Dragoon re: production requests	0.3
8/29/07	tcs w/ P.Richardson, G.Ikemoto, K.Dragoon, J.Miller all re: settlement; revise production requests and attn re: send same	2.2
9/7/07	mtg and tcs w/ K.Dragoon re: settlement; teleconf with Idaho Power re: same	1.5
9/10/07	draft motion to extend comment and related emails to utilities; draft email to J.Carkulis re: settlement; draft email to K.Dragoon re: same	1.8
9/12/07	tcs re: settlement w/ K.Dragoon, B.Kline, G.Ikemoto, P.Richardson, J.Miller; revise and finalize motion to vacate comment deadline	2.3
9/14/07	draft and send term sheet to Bart Kline	0.7
9/20/07	multiple emails w/ G.Ikemoto, P.Richardson, RNP all re: settlement and fuel forecast methodology case	1.4

9/23/07	review and edit draft Stipulation; draft outline of K.Dragoon testimony and email same to K.Dragoon	1.3
9/28/07	review and edit stipulation; tc w/ K.Dragoon re: same; emails to IPC re: same; review K.Dragoon testimony on settlement	2
10/21/07	review Exergy answer; begin drafting reply	1.1
10/23/07	draft reply to Exergy answer on motion	0.6
10/24/07	final edits and review of reply to Exergy answer	0.4
	<b>Total =</b>	<b>89.5</b>
	<b>Total less 15%=</b>	<b>76.1</b>

**IPC-E-07-03**

**APPLICATION FOR INTERVENOR FUNDING**

**EXHIBIT 2**

Hourly Rate:  
\$ 83.33

**Idaho**      **Avista**

Total Expense:    \$ 11,270.38    \$ 1,333.28

<i>Item</i>	<i>Date</i>	<i>Time (hrs)</i>	<i>Idaho</i>	<i>Avista</i>
Draft Letter to IPUC	2/7/07	2.00	\$ 166.66	
Bokenkamp Call re RNP letter to IPUC	2/8/07	0.50	\$ 41.67	
RNP internal briefing on Idaho Study	2/9/07	0.50	\$ 41.67	
Correspondence re study	2/9/07	0.50	\$ 41.67	
Correspondence re study	2/11/07	0.50	\$ 41.67	
Consultation w/ Kirby on IPC methodology.	2/14/07	1.00	\$ 83.33	
Correspondence re IPC Methods	2/21/07	0.75	\$ 62.50	
Conf Call with IPC	2/26/07	1.00	\$ 83.33	
NWIAP Peer Rvw Gp Discussion w/ Zavadil, DeVol, & Bokenkamp re IPCO Study methods	3/5/07	2.00	\$ 166.66	
Coordination mtg w/ Hardy	3/13/07	1.00	\$ 83.33	
Travel to IPC Wkshp	3/14/07	4.00	\$ 333.32	
IPC Wkshp & travel	3/15/07	8.00	\$ 666.64	
Meet w/ Bill Eddie re Idaho Process	3/23/07	1.00	\$ 83.33	
Meet w/ Kalich re Avista Methodology	3/20/07	2.00		\$ 166.66
Correspondence re 3/15 Wkshp	3/13/07	0.50	\$ 41.67	
Draft Wind/Hydro Operations Paper	3/18/07	3.00	\$ 249.99	
Rvw Draft Wind/Hydro paper w/ Lab guys	3/19/07	1.00	\$ 83.33	
Correspondence on Idaho study	3/24/07	1.00	\$ 83.33	
Conf call with IPC Staff on study	4/4/07	2.00	\$ 166.66	
Correspondence w/ Eddie re process	4/24/07	0.50	\$ 41.67	

Idaho Wind Study filing review	2/8-2/10/07	10.00	\$	833.30	
Correspondence w/ Kalich re hydro ops	3/19/07	1.00	\$	83.33	
Correspondence w/ IPC re hydro ops optimization	4/3/07	1.00	\$	83.33	
Rvw of IPC proposed method change Consulting w/ Avista	4/27/07	2.00	\$	166.66	
Rvw IPC Dynamic Reserves method	5/5/07	1.00	\$	83.33	
Rvw IPC Dynamic Reserves method	5/8/07	2.00	\$	166.66	
Rvw IPC Dynamic Reserves method	5/11/07	0.50	\$	41.67	
Rvw IPC Dynamic Reserves method	5/14/07	0.50	\$	41.67	
Rvw IPC Dynamic Reserves method	5/15/07	2.00	\$	166.66	
Rvw IPC Dynamic Reserves method	5/16/07	2.00	\$	166.66	
Rvw IPC Dynamic Reserves method	5/17/07	3.00	\$	249.99	
Rvw IPC Dynamic Reserves method	5/18/07	3.00	\$	249.99	
Rvw IPC Dynamic Reserves method	5/22/07	3.00	\$	249.99	
Rvw WindLogics Presentation	6/14/07	4.00	\$	333.32	
Rvw Kalich Spdsht	6/15/07	4.00	\$	333.32	
IPC Wkshp & travel	6/19-20/2007	12.00	\$	999.96	
Settlement Mtg	7/31/07	12.00	\$	999.96	
Settlement Mtg	8/10/07	8.00	\$	666.64	
Kalich Consult Variability Analysis	6/29/07	4.00	\$		
IPC Consultation with R Hardy	6/27/07	1.00	\$	83.33	
Avista Mtg w/ Bill Eddie	7/10/07	2.00	\$		
Settlement Mtg	8/9/06	1.00	\$	83.33	
Draft Settlement Letter to IOUs	7/19/07	3.00	\$	249.99	
Draft Settlement Letter to IOUs	7/24/07	2.50	\$	208.33	
Settlement Consultation w/ Eddie	7/24/07	0.50	\$	41.67	
Settlement Consultation w/ Eddie	8/1/07	0.50	\$	41.67	
Settlement Talks pre-mtg	8/9/07	2.50	\$	208.33	
Data Request Preparation Consult	8/22/07	2.00	\$	166.66	
Data Request Preparation	8/23/07	4.00	\$	333.32	
Settlement Talks	9/7/07	1.00	\$	83.33	
Internal Settlement Coordination	Various	5.00	\$	416.65	
Bill Eddie Consultation	9/20/07	1.00	\$	83.33	
Drafting Testimony (AVU)	10/2/07	2.00	\$	166.66	

Drafting Testimony	9/24/07	4.00	\$	333.32
Consultation w/ Eddie	8/20/07	0.50	\$	41.67
Settlement Mtg w/ IPCo	9/5/07	2.00	\$	166.66
Bill Eddie Consultation	9/10/07	1.00	\$	83.33
Consultation w/ Ikemoto et al	9/24/07	1.00	\$	83.33
Testimony Preparation	9/25/07	2.00	\$	166.66
Testimony Preparation	9/28/07	2.00	\$	166.66
Consultation w/ Eddie	10/1/07	1.00	\$	83.33
Expense Report Preparation	10/10/07	2.00	\$	166.66

**IPC-E-07-03**

**APPLICATION FOR INTERVENOR FUNDING**

**EXHIBIT 3**

**Renewable  
Northwest  
Project**

917 SW Oak  
Suite 303  
Portland, OR 97205

Phone: 503.223.4544  
Fax: 503.223.4554  
www.RNP.org

**Members**

3Degrees  
3TIER  
American Wind  
Energy Association  
BP Alternative Energy  
Bonneville Environmental  
Foundation  
Center for  
Energy Efficiency and  
Renewable Technologies  
CH2M Hill  
Citizens' Utility Board  
Clipper Windpower  
Columbia Energy Partners  
David Evans & Associates  
enXco, Inc.  
Eurus Energy America  
FPL Energy, Inc.  
Geothermal  
Resources Council  
GE Energy  
Green Mountain Energy  
Horizon Wind Energy  
Jones Stevedoring  
Montana Environmental  
Information Center  
Montana Public Interest  
Research Group  
Natural Resources  
Defense Council  
NW Energy Coalition  
Northwest  
Environmental Advocates  
Oregon State Public  
Interest Research Group  
Port of Vancouver, USA  
PPM Energy, Inc.  
Portland Energy  
Conservation, Inc.  
RES America  
Developments, Inc.  
Stoel Rives, LLP  
Vestas American  
Wind Technology, Inc.  
Washington  
Environmental Council  
Washington State Public  
Interest Research Group  
Western Resource Advocates  
Western Wind Power



Renewable Northwest Project

October 23, 2007

Bill Eddie  
610 SW Alder, Suite 910  
Portland, OR 97205

Dear Bill:

Here is an estimate of RNP's actual costs for staff time incurred to participate in the contested wind integration cases before the Idaho Public Utilities Commission. RNP has out-of-pocket travel and per diem costs, plus the cost of time spent working directly on issues related to the docket. RNP's costs of participation are accurately reflected in an hourly rate of \$83.33/hour for Ken Dragoon's time, which includes salary, benefits and administrative overhead.

That hourly rate does not reflect the full value of the services rendered. We contacted colleagues in the electric utility technical consulting field, and estimate that a consultant of Ken Dragoon's experience and expertise would bill out at approximately \$250 per hour.

RNP's participation in this docket required a very significant diversion of our limited resources at a time when many other important policy issues impacting renewable energy development are unfolding in the Northwest. RNP was not able to obtain any specific funding to support our participation in this case. Our commitment of resources for these cases constitutes a significant hardship for RNP.

RNP is a relatively small nonprofit (501(c)(3)) organization, with seven (7) employees and an annual budget of approximately \$680,000. While our membership includes many renewable energy companies, RNP is not a traditional industry organization. Our membership includes ratepayer advocates such as the Citizens Utility Board of Oregon and NW Energy Coalition, and conservation organizations such as the Natural Resources Defense Council. We rely on both membership dues, and donations and foundation grants to sustain our operations.

The tables below show time and expenses RNP provided in support of the Idaho Power and Avista PURPA wind dockets.

<b>Intervenor Expenses- IPCo</b>	
Direct Expenditures	\$ 1,302.73
Time	\$ 11,270.38
Total	\$ 12,573.11

***Intervenor Expenses- Avista***

Direct Expenditures	\$	-
Time	\$	1,333.28
Total	\$	1,333.28

Due to the relatively small amount of time expended in the PacifiCorp matter, we do not request intervenor funding in that case. The total request amounts to \$12,573.11 for expenses related directly to the Idaho Power docket and \$1,338.28 relating directly to the Avista docket.

Sincerely,



Rachel Shimshak  
Director, Renewable Northwest Project