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IDAHO 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 FOR AUTHORITY TO ) **CASE NO. IPC-E-07-08**  
INCREASE ITS BASE RATES AND CHARGES )  
FOR ELECTRICAL SERVICE TO ELECTRIC )  
CUSTOMERS IN THE STATE OF IDAHO )

**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, Eric L. Olsen, 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, in Idaho Power's general rate case, 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 Irrigators' President, Mark Mickelsen, Irrigators' member, Jeff Pahl, legal counsel, Eric L. Olsen, and consultant, Anthony J. Yankel, P.E., fully participated in these

ORIGINAL

proceedings. Procedurally, this case went forward like a full blown rate case with direct and rebuttal testimony being filed and all parties preparing for a hearing. Notwithstanding, the case was settled on the eve of hearing through a stipulation of the parties on the majority of the issues presented in this case. The stipulation was presented to the Commission on January 23, 2008.

The Irrigators' President, Mark Mickelsen, argued to the Commission that the irrigation class is getting a disproportionate share of the mounting system growth costs without regard of the fact that the irrigation class, as a whole, has not growing. He also pointed out that the irrigation class already received a 4% to 6% rate increase in 2007 due the unexpected loss of the BPA credit. Finally, he urged that the Peak Reward Program needs to be improved. The improvements he urged the Commission to adopt were an increase in the amount of the interruptibility credit, a relaxing of participation standards with a view to encourage more participation, and the implementation of a dispatchable interruptibility program similar to that on the Rocky Mountain Power system.

Irrigators' member, Jeff Pahl, testified before the Commission that he has been participating in the Peak Rewards Program by providing curtailment one day per week since 2005. He urged that an increase in the amount of the curtailment credit would be needed in order to justify him providing additional interruption under the Peak Rewards Program. The increase is needed to cover additional labor costs and justify exposing himself to possible yield loss due to insufficient watering during the irrigation season.

The Irrigators' consultant, Anthony Yankel, emphasized to the Commission that the cost of system growth is driving Idaho Power's need for rate increases. However, Idaho Power's cost of service study does not incorporate into its methodology a mechanism to allocate the costs of growth to those customer classes that are causing the growth on the system. As a consequence, the cost of

service study in this case allocated disproportionate costs to the Irrigators, as well as other static customer classes. Mr. Yankel also pointed out that Idaho Power's current load research data does not reflect the amount of curtailment being provided by the Peak Rewards Program. He also pointed out to the Commission that the Peak Rewards Program provides a greater benefit to the Idaho Power system than is currently being recognized in the curtailment credit being paid and that the curtailment credit must be increased significantly to be in line with the benefits being provided the Idaho Power system and encourage greater participation. Mr. Yankel further urged the Commission to require Idaho Power to continue on with the irrigation time-of-day program and establish time-of-day rates that would send the appropriate price signals to irrigators on the Idaho Power system.

The stipulation presented to the Commission in this case was the result of active participation of Mr. Mickelsen, Mr. Pahl and other Irrigator board members, Mr. Olsen, and Mr. Yankel. Key elements of the Irrigators' positions, such as the cost of service/growth issues, were reflected in the stipulation by the fact of the even rate spread between all customer classes, besides the residential class. Under stipulation, the Irrigators' positions on the Peak Rewards Program will be the subject of subsequent study this coming year between the Irrigators, Idaho Power, Commission Staff, and other interest parties, with the ultimate goal of providing changes and improvements for implementation in the 2009 irrigation season. The Irrigators actively participated in all settlement conferences and in the technical hearing before the Commission, and also joined in urging the Commission to adopt the settlement that had been reached between most parties.

(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. The expenses and costs were incurred in reviewing the Company's filing and intervenor testimony, preparing and

reviewing approximately 40 Irrigators data requests and responses, drafting and filing direct testimony, drafting and filing rebuttal testimony, drafting stipulation language, drafting cross-examination questions for the Company and intervenor witnesses, and participating in the settlement discussions that resulted in the settlement stipulation that was presented to the Commission.

(D) The costs described in Paragraph (A) above constitute a financial hardship for the Irrigators. The Irrigators currently have approximately \$42,768.46 in the bank with outstanding accounts payable from the last rate case and other small matters totaling approximately \$63,821.08. In addition, the Irrigators have outstanding accounts payable for legal and consultant fees and costs in this case total \$51,528.56 as set out in Exhibit "A" and accompanying attachments.

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 mailings are sent to approximately 7500 Idaho Irrigators (approximately two-thirds in the Idaho Power Company service area and one-third in the RMP service area), soliciting annual dues. The Irrigators recommend members make 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. The Irrigators also have just finished participating in the Rocky Mountain Power general rate case, which has added financial strain on the organization.

(E) The Irrigators' positions urged to be adopted by the Commission materially differed from those addressed by the Commission Staff and other parties on several important points. First, the Irrigators addressed the growth issue on Idaho Power system and proposed a method to allocate a portion of the growth costs to the customer classes causing the system growth in a way not to penalize other static customer classes. Second, the Irrigators also continue to advocate for improvement to the Peak Rewards Program. The Irrigators provided direct testimony that the curtailment credit amounts must be increased to encourage greater participation, to bring the credit in line with the benefit received by Idaho Power system, and help shave the critical summer peak that Idaho Power is facing on its system. In the Stipulation, Idaho Power, the Irrigators, Commission Staff and other interested parties will be meeting this year to improve the to address the issues raised by the Irrigators. The Commission Staff did not address these load control issues that the Irrigators had raised. Finally, the Irrigators urged the continuation of Idaho Power's time-of-use irrigation rate. The Irrigators believe that this type of voluntary program could also help reduce Idaho Power's summer peak. The Commission Staff did not address this issue.

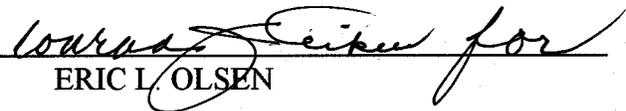
(F) The Irrigators' participation addressed issues of concern to the general body of users or consumers on Idaho Power's system. All customer classes have an interest in finding a method to equitably pay for the cost of Idaho Power's system growth. Further, the Peak Rewards Program has enabled Idaho Power to shave approximately 40 to 50mwh of load during the summer system peak. This reduction in peak load benefits all Idaho Power customer classes by reducing the overall system costs. This translates into lower rate increases when rate cases are filed. Continuation and expansion of the Peak Rewards Program may also defer the building of additional generation plant as indicated Idaho Power's most recent Integrated Resource Plan. Avoiding these type of costs is also a benefit to all of Idaho Power's customers.

(G) The Irrigators represent the irrigation class of customers under Schedule 10.

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 in the maximum amount allowable pursuant to Idaho Code § 61-617A and IDAPA 31.01.01.161 through .165.

DATED this 6<sup>th</sup> day of ~~January~~ <sup>February</sup>, 2008.

RACINE, OLSON, NYE, BUDGE &  
BAILEY, CHARTERED

By   
ERIC L. OLSEN

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6 day of ~~January~~<sup>February</sup>, 2008, I ~~serve~~<sup>caused to be</sup> served a true, correct and complete copy of the Idaho Irrigation Pumpers Association, Inc.'s Application for Intervenor Funding to each of the following, via U.S. Mail or private courier, e-mail or hand delivery, as indicated below:

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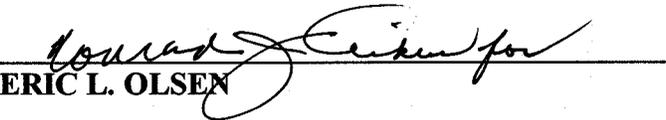
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ERIC L. OLSEN

**EXHIBIT A**

**SUMMARY OF EXPENSES INCURRED BY IRRIGATORS**  
**IN CASE NO. IPC-E-07-08**

1. Legal Fees:

Eric L. Olsen (Partner):	81.5 hrs @ \$175.00	\$14,262.50
Dave Bagley (Associate):	2.5 hours @ \$145.00	\$ 362.50
Sally Beitia (Paralegal):	3.0 hours @ \$75.00	\$ 225.00

Costs:

Tele. Conf./Long distance:	\$ 84.87
Postage:	\$ 0.00
Travel/Mileage	<u>\$ 718.69</u>

Total Work and Costs: \$15,653.56

2. Consultant Anthony J. Yankel:

287 hrs @ \$125 per hour \$35,875.00

Expenses:

Travel, room and meals \$ 0.00

Total Work and Costs: \$35,875.00

**TOTAL FEES AND EXPENSES: \$51,528.56**

RACINE OLSON NYE BUDGE & BAILEY, CHARTERED

IDAHO IRRIGATION PUMPERS ASSOCIATION

710.1518532

Fee Date	Atty	Rate	Hours to Bill	Amount	
6/13/2007	elo	175	0.2	\$ 35.00	TELEPHONE CONFERENCE WITH MARK MICKELSON; TELEPHONE CONFERENCE WITH RICK GALE RE: RATE CASE
6/13/2007	ELO	175	0.4	\$ 70.00	TELEPHONE CONFERENCE WITH TONY YANKEL RE: IPCO CASE FILING AND STRATEGY RE: SAME; CALL BARTO KLINE RE: GETTING ELECTRONIC COPY OF FILING
6/18/2007	ELO	175	0.2	\$ 35.00	REVIEW IPCO FILING AND SEE THAT FILING IS ORGANIZED FOR REVIEW
6/19/2007	ELO	175	0.2	\$ 35.00	REVIEW EMAIL FROM TONY YANKEL; EMAIL BART KLI RE: GETTING E-COPY OF FILING
6/21/2007	ELO	175	0.5	\$ 87.50	CONFERENCE WITH RANDY LOBB RE: IPCO RATE CASE ISSUES
6/29/2007	ELO	175	2.3	\$ 402.50	CONFERENCE WITH MARK MICKELSEN AND IDAHO POWER REPRESENTATIVES ABOUT CURRENT RATE CASE AND STATUS OF PEAK REWARDS PROGRAM
7/1/2007	ELO	175	0.2	\$ 35.00	SEE THAT PETITION TO INTERVENE IS PREPARED
7/2/2007	DB	145	0.7	\$ 101.50	REVIEW AND REVISE PETITION TO INTERVENE (ROCK MOUNTAIN POWER); SEE THAT PETITION IS FILED
7/19/2007	DB	145	1.8	\$ 261.00	REVISE FIRST DATA REQUEST AND SEE THAT SAME IS FILED AND SERVED TO APPROPRIATE PARTIES
7/23/2007	ELO	175	0.8	\$ 140.00	REVIEW IP'S RESPONSE TO STAFFS DATA REQUESTS; CONTINUED REVIEW OF IP FILING; REVIEW IDAHO POWER PROPOSED SCHEDULING AND FORWARD ON TO TONY YANKEL
7/24/2007	ELO	175	1.1	\$ 192.50	REVIEW IDAHO POWER FILING
7/27/2007	ELO	175	0.7	\$ 122.50	REVIEW SECOND DATA REQUESTS AND SEE THAT SAME ARE SENT OUT; FINALIZE DATA REQUESTS
7/31/2007	ELO	175	0.4	\$ 70.00	REVIEW IDAHO POWER PROTECTIVE AGREEMENT; EXECUTE EXHIBIT A; EMAIL SAME TO IDAHO POWER
8/2/2007	ELO	175	0.3	\$ 52.50	FINALIZE SECOND DATA REQUEST AND SEE THAT SAM IS SENT
8/6/2007	ELO	175	0.1	\$ 17.50	REVIEW STAFF DATA REQUEST AND FORWARD TO YANKEL
8/10/2007	ELO	175	0.3	\$ 52.50	REVIEW SCHEDULING ORDER AND CALENDAR THE SAME
8/14/2007	ELO	175	0.3	\$ 52.50	TELEPHONE CONFERENCE WITH JEFF PHAUL RE: PROVIDING PRE-FILED TESTIMONY IN IDAHO POWER CASE
8/22/2007	ELO	175	0.3	\$ 52.50	SEE THAT IDAHO POWER DATA REQUESTS ARE PREPARED AND SERVED ON COMPANY; EMAIL IIPA MEMBER E: GIVING LAY TESTIMONY IN RATE CASE
8/24/2007	ELO	175	0.3	\$ 52.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: ISSUE SON IDAHO POWER RATE CASE
9/7/2007	ELO	175	1.4	\$ 245.00	TELEPHONE CONFERENCE WITH TONY YANKEL RE: FINAL DATA REQUESTS TO IDAHO POWER; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: SAME; FINALIZE DATA REQUESTS AND SEE THAT SAME ARE SERVED UPON IDAHO POWER
9/17/2007	ELO	175	1	\$ 175.00	EMAIL LYNN TOMINAGA RE: IRRIGATOR CONFERENCE CALL; TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: SAME; TELEPHONE CONFERENCE WITH JEFF PAHL RE: MEETING; TELEPHONE CONFERENCE WITH DAVE PICKETT RE: IIPA MEETING ON IDAHO POWER RATE

						CASE; TELEPHONE CONFERENCE WITH DEAN STEVENSON RE: IIPA MEETING ON IDAHO POWER RATE CASE
9/18/2007	ELO	175	0.9	\$	157.50	TELEPHONE CONFERENCE WITH STAFF RE: ISSUES WITH IDAHO POWER RATE CASE FILING; TELEPHONE CONFERENCE WITH TONY YANKEL RE: SAME
10/10/2007	ELO	175	0.2	\$	35.00	REVIEW YANKEL DRAFT TESTIMONY
10/15/2007	ELO	175	0.6	\$	105.00	CONTINUED REVIEW OF DRAFT TESTIMONY; TELEPHONE CONFERENCE WITH TONY YANKEL RE: IDAHO POWER CASE AND REVIEW OF TESTIMONY; CALL AND LEAVE MESSAGE WITH JEFF PAHL
10/15/2007	ELO	175	0.6	\$	105.00	CONTINUED REVIEW OF YANKEL'S DRAFT TESTIMONY
10/16/2007	ELO	175	3	\$	525.00	CONTINUED REVIEW OF YANKEL DRAFT TESTIMONY; TELEPHONE CONFERENCE WITH TONY YANKEL AND REVIEW TESTIMONY; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: ISSUES IN IDAHO POWER RATE CASE; REVIEW EMAIL RE: PROPOSED CHANGE OF SCHEDULING ORDER
10/17/2007	ELO	175	0.8	\$	140.00	REVIEW EMAILS FROM INTERVENORS RE: CHANGE IN IDAHO POWER SCHEDULING; EMAIL PARTIES RE: IRRIGATOR POSITIONS; TELEPHONE CONFERENCE WITH TONY YANKEL RE: SAME
10/17/2007	ELO	175	0.3	\$	52.50	TELEPHONE CONFERENCE WITH RANDY LOBB RE: IDAHO POWER RATE CASE; CALL AND LEAVE MESSAGE WITH WELDON STUTZMAN RE: SETTLEMENT NEGOTIATION
10/23/2007	ELO	175	1	\$	175.00	PREPARE FOR IDAHO POWER SETTLEMENT DISCUSSIONS
10/24/2007	ELO	175	3	\$	525.00	TRAVEL TO BOISE FOR SETTLEMENT DISCUSSIONS (O WAY)
10/24/2007	ELO	175	3.2	\$	560.00	PREPARE FOR SETTLEMENT MEETINGS; ATTEND IDAHO POWER SETTLEMENT MEETINGS; CALL AND LEAVE MESSAGE WITH YANKEL RE: SAME; TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: SAME; TELEPHONE CONFERENCE WITH TONY YANKEL RE: ISSUES RAISED IN IDAHO POWER RATE CASE
11/27/2007	ELO	175	0.7	\$	122.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: STATUS OF IDAHO POWER DIRECT TESTIMONY
11/30/2007	ELO	175	1	\$	175.00	REVIEW YANKEL DRAFT DIRECT TESTIMONY
12/3/2007	ELO	175	4.9	\$	857.50	REVIEW YANKEL DRAFT DIRECT TESTIMONY; LEGAL RESEARCH RE: CASE ON DISCRIMINATORY RATES
12/4/2007	ELO	175	2.2	\$	385.00	CONTINUED REVIEW OF YANKEL DRAFT DIRECT TESTIMONY; EMAIL YANKEL RE: TESTIMONY COMMENT CALL AND LEAVE MESSAGE WITH JEFF PAHL RE: TESTIMONY; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: TESTIMONY AND CONFERENCE CALL
12/5/2007	ELO	175	1.2	\$	210.00	CONFERENCE CALL WITH TONY YANKEL AND MARK MICKELSEN; CONFERENCE CALL WITH JEFF PAHL AND TONY YANKEL
12/6/2007	ELO	175	1.1	\$	192.50	TELEPHONE CONFERENCE WITH TONY YANKEL AND REVIEW FINAL COMMENTS ON TESTIMONY; TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: STATUS OF CASE AND FILING DEADLINE; DRAFT TESTIMONY OF MARK MICKELSEN
12/7/2007	ELO	175	0.4	\$	70.00	GATHER EXHIBITS FOR YANKEL TESTIMONY; FINALIZ YANKEL DIRECT TESTIMONY; TELEPHONE CONFERENCE WITH DEAN STEVENSON RE: PROVIDING TESTIMONY
12/9/2007	ELO	175	3	\$	525.00	DRAFT TESTIMONY OF JEFF PAHL; CONFERENCE WITH JEFF PAHL RE: SAME AND FINALIZE TESTIMONY
12/10/2007	SAB	75	2.1	\$	157.50	CONFERENCE WITH ATTORNEY OLSEN RE: EXHIBITS AND FILING; ORGANIZE EXHIBITS; LETTER TO JEWEL CERTIFICATE OF SERVICE; CREATE SEARCHABLE DIS

Date	Code	Rate	Hours	Unit	Amount	Description
12/10/2007	ELO	175	4.5	\$	787.50	FOR REPORTER TELEPHONE CONFERENCE WITH TONY YANKEL RE: FINALIZING TESTIMONY; CONTINUED DRAFTING OF TESTIMONY OF MARK MICKELSEN AND TELEPHONE CONFERENCE WITH STEPHANIE MICKELSEN RE: SAME; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: REVIEW OF TESTIMONY; FINALIZE TESTIMONY AND EXHIBITS AND SEE THAT SAME IS FILED
12/11/2007	SAB	75	0.5	\$	37.50	TELEPHONE CONFERENCE WITH IPUC CLERK; CREATE SEARCHABLE DISK
12/12/2007	SAB	75	0.4	\$	30.00	EMAIL FROM IPUC RE: EXHIBITS TO YANKEL TESTIM CLARIFY FOR CLERK
12/19/2007	ELO	175	1.9	\$	332.50	PARTICIPATE IN IDAHO POWER SETTLEMENT CONFERENCE; TELEPHONE CONFERENCE
12/26/2007	ELO	175	2.3	\$	402.50	REVIEW DISCOVERY REQUEST; CALL AND LEAVE MESSAGE WITH YANKEL; TELEPHONE CONFERENCE WITH TONY YANKEL RE: REBUTTAL TESTIMONY; SEE THAT YANKEL'S WORK PAPERS ARE PROVIDED TO PARTIES TO CASE
12/31/2007	ELO	175	0.7	\$	122.50	PREPARE DISCOVERY RESPONSE TO IDAHO POWER AND SEE THAT SAME IS SERVED
1/2/2008	ELO	175	2.9	\$	507.50	REVIEW DRAFT OF YANKEL REBUTTAL TESTIMONY; REVIEW LEGAL RESEARCH ON DISCRIMINATORY RATES AND AUTHORITY OF COMMISSION
1/3/2008	ELO	175	1.9	\$	332.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: REVIEW OF REBUTTAL TESTIMONY; TELEPHONE CONFERENCE WITH RANDY LOBB RE: ISSUES IN THE RATE CASE
1/4/2008	ELO	175	2.8	\$	490.00	REVIEW FINAL REBUTTAL TESTIMONY; TELEPHONE CONFERENCE WITH TONY YANKEL RE: SAME; FINALIZ REBUTTAL TESTIMONY AND SEE THAT SAME IS FILED SEE THAT DISK OF TESTIMONY IS SENT TO COMMISS
1/7/2008	ELO	175	0.4	\$	70.00	TELEPHONE CONFERENCE WITH TONY YANKEL RE: REVIEW OF PARTIES; REBUTTAL TESTIMONY
1/8/2008	ELO	175	0.5	\$	87.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: ISSUES RAISED BY STAFF ON GROWTH ISSUES
1/8/2008	ELO	175	0.5	\$	87.50	TELEPHONE CONFERENCE WITH BRENDA TOMINAGA RE: STATUS OF IDAHO POWER RATE CASE; TELEPHONE CONFERENCE WITH TONY YANKEL RE: CONTINUED REVIEW OF REBUTTAL TESTIMONY
1/10/2008	ELO	175	0.3	\$	52.50	REVIEW E-MAIL RE: SETTLEMENT CONFERENCE; TELEPHONE CONFERENCE WITH CONNIE BUCY RE: GETTING MS WORD COPY OF TESTIMONY
1/11/2008	ELO	175	1.2	\$	210.00	TELEPHONE CONFERENCE WITH TONY YANKEL RE: STATUS OF IDAHO POWER SETTLEMENT; TELEPHONE CONFERENCE WITH TONY YANKEL E-MAIL E-COPY OF DIRECT REBUTTAL TESTIMONY TO CONNIE BUCY; CAL AND LEAVE MESSAGE WITH RANDY LOBB; TELEPHONE CONFERENCE WITH RANDY LOBB RE: IDAHO POWER CASE AND SETTLEMENT ISSUES
1/14/2008	ELO	175	0.8	\$	140.00	TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: STATUS OF IDAHO POWER CASE AND SETTLEMENT ISSUES; TELEPHONE CONFERENCE WITH TONY YANKEL RE: UPCOMING SETTLEMENT CONFERENCE AND IPC INTERRUPTIBILITY CREDIT PRICING
1/15/2008	ELO	175	2.7	\$	472.50	REVIEW VOICEMAIL FROM PETER RICHARDSON; CONFERENCE WITH TONY YANKEL RE: SETTLEMENT NEGOTIATIONS; PREPARE FOR SETTLEMENT NEGOTIATIONS; REVIEW REBUTTAL TESTIMONY OF COMPANY AND INTERVENORS
1/16/2008	ELO	175	3	\$	525.00	TRAVEL ONE WAY TO BOISE
1/16/2008	ELO	175	3.9	\$	682.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE:

					SETTLEMENT ISSUES; TELEPHONE CONFERENCE WITH PETER RICHARDSON RE: SETTLEMENT ISSUES; ATTEN IDAHO POWER SETTLEMENT CONFERENCE; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: TERMS OF SAME AND PEAK REWARDS ISSUES; TELEPHONE CONFERENCE WITH TONY YANKEL RE: SETTLEMENT TERMS; CONTINUE WITH SETTLEMENT CONFERENCE
1/17/2008	ELO	175	0.9	\$ 157.50	TELEPHONE CONFERENCE WITH DEAN STEVENSON RE: IDAHO POWER SETTLEMENT AND PEAK REWARDS PROGRAM WORKING GROUP; TELEPHONE CONFERENCE WITH JEFF PAHL RE: SAME; TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: RESULTS OF SETTLEMENT NEGOTIATIONS
1/18/2008	ELO	175	3.5	\$ 612.50	DRAFT SETTLEMENT AGREEMENT LANGUAGE FOR PEAK REWARDS PROGRAM IN STIPULATION; TELEPHONE CONFERENCE WITH TONY YANKEL RE: COMMENTS ON SETTLEMENT STIPULATION; REVIEW COMMENTS FROM BOARD MEMBER; TELEPHONE CONFERENCE WITH BART KLINE AND MAGGIE BRILZ RE: CHANGES TO SETTLEMENT STIPULATION
1/22/2008	ELO	175	0.4	\$ 70.00	REVIEW REVISED STIPULATION
1/23/2008	ELO	175	3	\$ 525.00	TRAVEL TO BOISE FROM POCATELLO
1/23/2008	ELO	175	1.3	\$ 227.50	PREPARE FOR AND ATTEND AND PARTICIPATE IN IDA POWER HEARING TO PRESENT SETTLEMENT STIPULATION
2/5/2008	ELO	175	1.5	\$ 262.50	PREPARE APPLICATION FOR INTERVENOR FUNDING
2/6/2008	ELO	175	1.5	\$ 262.50	CONTINUE PREPARE APPLICATION FOR INTERVENOR FUNDING AND FILE
<b>TOTAL FEES</b>			<b>87</b>	<b>\$ 14,850.00</b>	<b>IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. 2007 IDAHO POWER GENERAL RATE CASE FILING</b>

<b>Cost Date</b>	<b>Amount</b>	
10/17/2007	\$ 84.87	TELECONFERENCE CHARGES
11/15/2007	\$ 226.98	RT MILEAGE POCATELLO-BOISE - 10/24 - ELO
2/4/2008	\$ 491.71	RT MILEAGE POCATELLO-BOISE - 1/16 AND 1/23 - ELO; MEALS IN BOISE - ELO
<b>TOTAL COSTS</b>	<b>\$ 803.56</b>	<b>IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. 2007 IDAHO POWER GENERAL RATE CASE FILING</b>

<u>Date</u>	<u>IPCo filings</u>	<u>Description</u>
June 25	4	Review testimony and exhibits of Lamont Keen, Steven Keen, Lori Smith, and Schwendiman.
29	2	Review filing in preparation for conference call; attend meeting with Irrigators and Idaho Power by phone to discuss Idaho Powers position on the rate case and other issues related to rates and costs of service.
July 6	2	Review testimony and exhibits of Brilz as well as testimony of Gale; compare Brilz exhibits to those of the last case.
9	6	Develop initial set of interrogatories regarding billing usage data, load research data, bill frequency data, system supply and sales, marginal cost data, scheduled maintenance, development of distribution data.
10	2	Review data regarding Distribution substations found in Tatum's exhibit and compare it to similar data provided by Brilz in the last case.
25	1	Review data responses to Industrial Customers Request Set 3 and manipulate the costs of service studies provided.
Aug 1	4	Review cost of service studies provided by the Company in this case as well as the development of allocation factors.
3	6	Review the Company's last two IRP's for costs associated with growth and the DSM programs that have been developed to reduce the increase in energy and the increases that are taking place in peak
8	6	Review other data regarding time of day rates that may be useful for smaller farmers for which the Company does not want to include in its irrigation load management program; review possible impacts of these
10	6	Review usage data throughout each month by hour to develop relationships between time of day and day of the week; develop patterns of usage from hourly data by day of the week; develop scenarios regarding how farmers can shift usage into times when their
13	7	Review usage data throughout each month by hour to develop relationships between time of day and day of the week; develop patterns of usage from hourly data by day of the week; develop scenarios regarding how farmers can shift usage into times when their

<u>Date</u>	<u>IPCo filings</u>	<u>Description</u>
21	8	Review data responses on Micron regarding usage levels of various classes by month in order to see how data fit with the Company's filed usage data; compile historic usage data of Irrigators in Idaho and Oregon and compare with that presented in the FERC Form 1's: review losses and impact of losses in the Company's filing with the losses that have historically be recorded in the FERC Form 1's.
22	6	Review responses to Irrigator's first data set; review Idaho Powers hourly purchases and prices; review the extent to which load research data covers various customer sizes.
Sept 6	3	Review data responses regarding Irrigator set 2 regarding PCA predicted costs under various scenarios; analyze data provided with responses in order to show consistency between responses.
7	7	Review data associated with the company's response 2-1 to the Irrigators and compare how the monthly projections for 2007 compared with the actuals for 2006 with respect to average usage, maximum usage, and light-load and heavy load usage; develop interrogatories to cover problems or inconsistencies uncovered.
10	2	Review response to IIPA 2-2 and develop relationships between what the model predicted for 2007 on an hourly basis with the actual results of 2006 by hour and by month for peak, average and on-peak and off-
12	4	Analyze hourly system costs data in order to form relationships between usages and costs by hour of the day and day of the week.
27	2	Review recent data responses from the Company regarding the Irrigators and the US Department of Energy.
28	8	Review data regarding load management program for Irrigators: review past summaries of irrigation load management that were prepared by the Company; review hourly information regarding usage of Irrigation customers on Schedule 23.
Oct 1	7	Review all past data responses to the Irrigators; review direction of data responses for Micron and the US Department of Energy; calculate costs of purchase power and surplus sales during the hour of the system peaks for the last four years.

<u>Date</u>	<u>IPCo filings</u>	<u>Description</u>
2	8	Develop overall direction of testimony regarding problems with normalized sales data for power cost calculations, lopsided growth, inappropriate or lack of interruptions when they should have occurred, reflections on why cost-of-service results do not reflect cost causation, and credit for Schedule 23 customers; develop historical background to list historic usage over various classes and the historic allocation of costs and billing determinants for Irrigators.
3	8	Develop testimony regarding historic usage, historic allocation factors and the mis-match; review and develop data to support changes in allocation factors and amount of plant allocated over the last 14 years.
4	7	Develop data and exhibits that establish a weighting for growth that is reflective of the next ten years out and is in line with the Company's support behind its base case allocation method.
5	8	Develop testimony regarding the weighting of allocation factors that will reflect the growth that is to take place along the system and how that fits in with the Company's Base Case allocation method; develop testimony regarding the problems with the curtailment customers in the load research data being too few on the days of the peak as well as
8	8	Develop testimony regarding the BPA credit; develop testimony regarding the irrigation peak rewards program, including the success it has enjoyed or the lack there of, a development of a proper level of credit based upon both the Company's avoided capacity costs and the report that was performed by a consultant for PacifiCorp.
9	8	Work on developing numbers for the level of the credit that can be provided for the Irrigation Peak Rewards program; develop appropriate testimony that outlines the method for this calculation of a credit.
10	8	Develop testimony regarding the development of a time-of-day rate for Irrigators; review draft testimony and tighten up the draft as far as writing errors are concerned.
11	6	Develop additional background and support for the \$94/kW marginal cost of avoided capacity argument.
12	8	Develop load research data in a form where it can be analyzed to determine what the Irrigation class as a whole uses on an hourly basis so that a time-of-day analysis can be performed in order to develop a rate that is neutral if there is no shift in load.

<u>Date</u>	<u>IPC filings</u>	<u>Description</u>
15	8	Continue to work over load research data in order to develop an average irrigator usage pattern for a time of day scenario; develop a time of day rate based upon average usage pattern and other concepts or stated goals of a good time of use program.
16	8	Review other marginal cost data in support of the \$98/kWh figure used in the testimony; utilized the marginal cost data that was provided in the case as a workpaper for generation; start to put testimony into final
17	7	Work to finalize testimony; discussion with Olsen regarding his suggested changes.
25	1	Review proposals regarding where testimony is going as presented by the parties in the prehearing conference.
Nov 26	5	Review previous draft of testimony; review testimony of Company witness Tantu; review the development of the various cost of service studies developed by the Company in this case.
27	6	Review historic usage levels between the Irrigators and the rest of the Company; review the treatment of billing determinants in this and previous cost of service studies filed by the Company.
28	7	Review relationship of historic usage and costs of installing new facilities; review report of workshop group that looked into allocations; write testimony regarding growth issues; look into additional way to measure growth (5 year data verse 10 year data).
29	7	Review costs of DSM projects and the cost basis for other planned resource additions regarding levelized costs; review 2006 and the 2004 IRP's for the costs of various programs that are being considered and
29	8	Review costs of DSM projects and the cost basis for other planned resource additions regarding levelized costs; review 2006 and the 2004 IRP's for the costs of various programs that are being considered and implemented; conversations with the Company regarding the treatment of costs associated with the Residential and Commercial "in-place" DSM programs; write testimony.
30	8	Review the Company's concerns regarding free-rider and develop a method that would speak to the Company's concern without hurting all customers; finalize rates and rate design to be charged for customers curtailing; address the difference in recommendations in this case and the stipulation in the PacifiCorp case; write testimony.

<u>Date</u>	<u>IPCo filings</u>	<u>Description</u>
Dec 3	7	Make final review of data responses and data I developed in order to insure that the testimony is factually based.
4	6	Make final review of data responses and data I developed in order to insure that the testimony is factually based.
5	2	Conversations with Olsen and Mickleson regarding the Idaho Power testimony; making corrections to testimony.
6	6	Final review of testimony; make appropriate changes and corrections.
7	6	Review time-of-day material being discussed by Idaho Power for the smaller commercial customers; review Dr. Peseau's testimony regarding forecast test year, revenue adjustments, and his proposed changes in cost-of-service studies; review accompanying exhibits.
10	1	Review Dr. Peseau's testimony regarding cost of service studies.
12	1	Conversations with Olsen; attempt to connect with conference call; review of Hessing testimony.
20	1	Review testimony of Reading and make notes regarding agreement and disagreement.
21	2	Review testimony of Dennis Goins and Kevin Higgins and make notes regarding agreement and disagreement.
26	2	Review data requests from Idaho Power; review my testimony regarding what was being sought; develop data responses; discussion
27	8	Review testimony of other parties; outline differences of position between them and my Direct testimony; write rebuttal testimony.
28	8	Review testimony of other parties; outline differences of position between them and my Direct testimony; write rebuttal testimony.
Jan 4	1	Discussions with Olsen regarding draft testimony; rewriting some of the testimony.
5	2	Discussions with Olsen regarding draft testimony; rewriting and finalizing the testimony.

<u>Date</u>	<u>IPCo filings</u>	<u>Description</u>
7	2	Read rebuttal testimony of Company, Peseau, and Hessing; discuss with Olsen.
15	2	Review various load control options, prices, times, of the various Company's and formulate information to Olsen to use; conversations with Olsen regarding same as well as stipulation discussion points.
16	2	Multiple conversations with Olsen regarding stipulation; attend stipulation conference via phone.
18	1	Review proposed language in stipulation and that proposed by Olsen; discussion with Olsen.
Total	287	

287 hours @ \$125 per hour = \$35,875