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LOUIS F. RACINE (1917-2005)
WILLIAM D. OLSON, OF COUNSEL

January 2, 2009

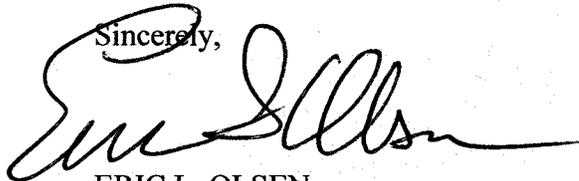
Jean Jewell
IPUC Commission Secretary
472 W. Washington
Boise, Idaho 83702

Re: IPC-E-08-10

Dear Mrs. Jewell:

Enclosed for filing you will find the original and seven (7) copies of the Application for Intervenor Funding of The Idaho Irrigation Pumpers Association, Inc.

Sincerely,



ERIC L. OLSEN

ELO/elo
Enclosures

c: Service List (via regular mail)

N:\RCB\15185\IPC-E-08-10\jean jewell ltr.1.2.09.wpd

P.S. The power went out in Boise ⁰¹1/2/09 in the afternoon and made it so we could not physically file. Have mailed this date.

Thanks Eric L. Olsen

RECEIVED
2009 JAN -5 AM 9:25
IDAHO PUBLIC
UTILITIES COMMISSION

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RECEIVED
2009 JAN -5 AM 9: 25
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 COMPANY FOR) CASE NO. IPC-E-08-10
AUTHORITY TO INCREASE ITS 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, 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 Company's ("IPC") 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' Vice President, Sidney F. Erwin, its legal counsel, Eric L. Olsen, and its consultant, Anthony J. Yankel, P.E., fully participated in these

proceedings. Further, Irrigator's President, Mark Mickelsen, its Executive Director, Lynn Tominaga, its Board Member, Dean Stevensen, and other members of irrigation class provided testimony at the public hearings held in Pocatello, Twin Falls, and Boise, Idaho. Procedurally, this case was a full blown rate case with direct and rebuttal testimony being filed and all parties preparing for and attending the technical hearings held on December 16th through December 19th, 2008.

Irrigators' Vice President, Sidney F. Erwin, testified that the expansion of ground water pumping corresponded with the surplus of cheap, clean electricity available from IPC's Hells Canyon complex. He testified that irrigation pumping has also expanded due to the switch from flood to more efficient sprinkler irrigation. However, he testified that the growth of additional ground water pumping has been static since the 1992 when a moratorium on new ground water rights was decreed. This lack of irrigation water right growth has corresponded with a lack of growth of electricity demand within the Irrigation Class for the last two decades and into the foreseeable future.

As a participant in past and present integrated resource planning committees, Mr. Erwin testified that the primary cause of growth on IPC's system and the corresponding need for this current rate increase is the residential and commercial load growth in the Treasure Valley. He also noted that IPC's class cost of service study assigns a disproportionate amount of growth related costs to the Irrigation Class notwithstanding the fact that the Irrigation Class is not causing the growth and he urges the Commission that this needs to be corrected.

Mr. Erwin also testified that he has participated in IPC's Irrigation Peak Reward Program ("Program"). His participation in this Program provides him with a voluntary

means of controlling his electricity costs, while at the same time reducing Irrigation Class load and corresponding summer peak costs allocated to the Irrigation Class. IPC's system is also benefited by the Program's reduction of approximately 40 MW of system, summer peak load, which helps slow the pace of growth related costs driving the need for rate increases. He further testified that the Commission is currently considering changes to the Program that would allow IPC the ability, at its options, to interrupt electricity to participating irrigator's pumps during critical summer peak hours. This change has the potential to significantly benefit the IPC system by reducing summer peak load by an estimated 112 to 200 MW and further slow growth related costs.

The Irrigators' consultant, Anthony J. Yankel, testified that there has been very rapid growth on the IPC's system. However the Irrigation Class load has been flat for the last 25 years. The cost of growth affects all aspects of the IPC's operations. IPC's cost of service study allocates costs of growth on the assumption that all classes are growing equally. This erroneous assumption results in the Irrigation Class and other static classes getting allocated a disproportionate amount of growth related costs notwithstanding the fact that they are not causing the bulk of these growth related costs. As a means of addressing the growth issue, Mr. Yankel testified that IPC's cost of service study should be modified to match the marginal cost allocation factors with the customer classes causing the increase in these marginal costs. His proposed modifications utilize cost of service principals and are applied prospectively in a nondiscriminatory manner. When the impact of disproportionate growth is properly taken into account, the Irrigation Class rate of return is above the system average and he asks the Commission to give the Irrigation Class a below average rate increase.

Mr. Yankel also testified that the Irrigation Peak Rewards Program (“Program”) is currently being revised to allow IPC to interrupt participating irrigators’ pumps at their option during summer peak times in June and July. This revision to the Program should greatly increase participation levels and become a major resource for IPC to use in controlling its summer peak load. These changes should be in place for next summer’s Irrigation season and system peak loads. Thus, Mr. Yankel urged the Commission that any consideration of cost of service and revenue responsibility for the Irrigation Class should reflect the fact that there will be major changes to the system peak loads when these rates are in effect as well as the Irrigation Class’ contribution to those peak loads.

Mr. Yankel further testified that IPC has historically allocated Sales For Resale revenues on a simplistic basis (annual energy usage and/or generation demand responsibility). Data and computing techniques are available today to match these sales on an hourly basis with the cost causation that makes these sales possible. An example is presented as to how this can be done and a recommendation is made to consider such techniques for future cases to benefit all customer classes.

(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 (direct and rebuttal), preparing and reviewing approximately 35 Irrigators data requests and responses, drafting and filing direct testimony, drafting and filing rebuttal testimony, preparing cross examination questions for various witnesses, and participating in the public and technical hearings held by the Commission. Without incurring these

expenses and costs, the Irrigators would not have been able to fully participate in this matter.

(D) The costs described in Paragraph (A) above constitute a financial hardship for the Irrigators. The Irrigators currently have approximately \$5,000.00 in the bank with outstanding accounts payable from the IPC-E-08-23 case, this case (through the technical hearings), the PAC-E-08-07 case and expenses of operations totaling approximately \$45,000.00.

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. 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 is believed to be attributable to the current depressed 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 general rate cases such as this one due to the time and expense that has to be incurred to fully participate in such a case. As a result of the Irrigators' financial constraints, participation in case review, filing of testimony and cross-examination has been selective and, primarily, on a limited basis to the extent possible.

(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 and based on cost of service principals. No other party addressed this issue head on. If this issue is not addressed, then the growth issue will continue to be dealt with on a piecemeal basis like IPC is doing with the revisions to its Rule H Tarriff for new service attachments and distribution line installations and alterations (IPC-E-08-22) and with the new proposed Hoku Facility energy contract that prices portions of the energy to cover the marginal costs incurred for the increased load Hoku will put on IPC's system (IPC-E-08-21). Second, as a outgrowth of the 2007 rate case, the Irrigators have brought to the Commission revisions to the IPC Peak Rewards Program that should significantly increase participation and should significantly shave peak summer load and slow the costs of growth on IPC's system to benefit all customer classes. Finally, with the changes in technology, the Irrigators urged that the Commission to further look at how

sales for resale are determined. Specifically, data and computing techniques are available today to match these sales on an hourly basis with the cost causation that makes these sales possible. The Irrigators urged the Commission to look into this matter further to see if costs and benefits of sales for resale can be better assigned to the classes causing the costs or those classes that are allowing the benefits to be obtained. The Commission Staff did not address these issues.

(F) The Irrigators' participation addressed issues of concern to the general body of users or consumers on IPC'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 IPC in the past to shave approximately 40 of load during the summer system peak and will in the future shave more than 112 MW of load during the summer system peak if the proposed changes are adopted. 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. Finally, looking at the sales for resale issues ensures that costs and benefits of sales for resale will be properly assigned to all customer classes.

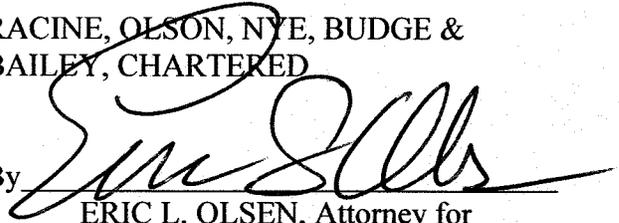
(G) The Irrigators represent the irrigation class of customers under Schedule 24.

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

DATED this 2nd day of January, 2009.

RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED

By

A handwritten signature in black ink, appearing to read "Eric L. Olsen", written over a horizontal line.

ERIC L. OLSEN, Attorney for
Idaho Irrigation Pumpers Assn., Inc.

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 2nd day of January, 2009, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

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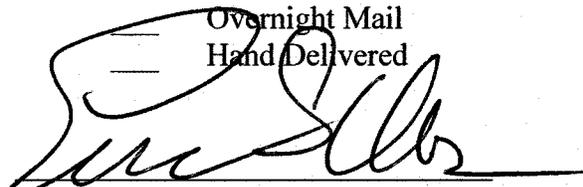
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ERIC L. OLSEN

EXHIBIT A

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

1. Legal Fees:

Eric L. Olsen (Partner):	148 hrs @ \$175.00	\$27,380.00
Pam Mottishaw (Paralegal):	1.8 hrs @ \$75.00	\$ 135.00

Costs:

Tele. Conf./Long distance:	\$ 0.00
Postage:	\$ 16.32
Travel/Mileage	\$ 273.78
Lodging & Meals	<u>\$ 676.93</u>

Total Work and Costs: \$28,482.03

2. Consultant Anthony J. Yankel:

376 hrs @ \$125 per hour	\$47,000.00
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Expenses:

Travel, room and meals	<u>\$ 1001.67</u>
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Total Work and Costs: \$48,001.67

TOTAL FEES AND EXPENSES:

\$76,483.70

ATTACHMENT 1

Trans Date	Atty	Rate	Hours to Bill	Amount	
7/9/2008	ELO	185	0.5	92.50	REVIEW FIRST DATA REQUESTS AND SEE THAT SAME ARE SERVED
7/28/2008	ELO	185	0.4	74.00	TELEPHONE CONFERENCE WITH TONY YANKEL RE: IDAHO POWER RATE CASE AND PRELIMINARY ISSUES
7/31/2008	ELO	185	0.2	37.00	TELEPHONE CONFERENCE WITH TONY YANKEL RE: IDAHO POWER RATE CASE
8/6/2008	ELO	185	0.2	37.00	CONFERENCE WITH NJ RE: PREPARATION OF SECOND DATA REQUESTS
8/6/2008	ELO	185	0.2	37.00	REVIEW VOICEMAIL AND EMAIL BART KLINE RE: PRODUCTION REQUEST
8/7/2008	ELO	185	0.1	18.50	REVIEW AND FINALIZE SECOND DATA REQUESTS
8/18/2008	ELO	185	0.1	18.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: IPCO'S TREATMENT OF REDUCED DEMAND IN THE PE REWARD PROGRAM PROGRAM
8/25/2008	ELO	185	0.1	18.50	SEE THAT THIRD SET OF INTERROGATORIES ARE PREPARED
8/29/2008	ELO	185	0.1	18.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: NAMES OF SUBSTATIONS
10/6/2008	ELO	185	2	370.00	REVIEW COMPANY TESTIMONY
10/7/2008	ELO	185	2.4	444.00	CONTINUED REVIEW OF COMPANY TESTIMONY
10/8/2008	ELO	185	2.1	388.50	REVIEW AND REVISE YANKEL TESTIMONY; TELEPHON CONFERENCE WITH TONY YANKEL RE: TESTIMONY AN GETTING LAY TESTIMONY; OUTLINE LAY TESTIMONY
10/8/2008	ELO	185	2.6	481.00	CONTINUED REVIEW OF TATUM TESTIMONY; TELEPHO CONFERENCE WITH SID ERWIN RE: PROVIDING TESTIMONY; TELEPHONE CONFERENCE WITH YANKEL RE: SAME AND PRIOR ISSUES WITH GROWTH ARGUME
10/9/2008	ELO	185	1	185.00	CONTINUED REVIEW OF COMPANY TESTIMONY
10/10/2008	ELO	185	0.7	129.50	DRAFT LAY TESTIMONY OF SID ERWIN
10/14/2008	ELO	185	3	555.00	CONTINUE REVIEW OF COMPANY TESTIMONY
10/15/2008	ELO	185	1.4	259.00	CONTINUE REVIEW YANKEL DRAFT TESTIMONY; TELEPHONE CONFERENCE WITH BRENDA TOMINAGA RE RECENT IRP MEETING; TELEPHONE CONFERENCE WIT LYNN TOMINAGA RE: FILING OF TESTIMONY
10/15/2008	ELO	185	0.5	92.50	CONTINUE REVIEW YANKEL'S DRAFT TESTIMONY
10/16/2008	ELO	185	4.3	795.50	CONTINUE REVIEW OF YANKEL'S DRAFT TESTIMONY; TELEPHONE CONFERENCE WITH SID ERWIN RE: GROWTH TESTIMONY; CONFERENCE WITH TONY YANKEL RE: REVIEW OF TESTIMONY
10/17/2008	ELO	185	4.1	758.50	DRAFT TESTIMONY OF SID ERWIN; REVIEW PCA WORKSHOP MATERIALS RE: WATER SUPPLY ISSUES; RESEARCH INFORMATION ON PRIOR IPC POSITIONS THE WATER ISSUE; DRAFT TESTIMONY OF SID ERWI
10/20/2008	ELO	185	4.9	906.50	CONTINUE DRAFTING ERWIN TESTIMONY
10/21/2008	ELO	185	7.8	1,443.00	CONTINUE REVIEW COMPANY TESTIMONY AND PRIOR TESTIMONY OF PARTIES ON ISSUES; TELEPHONE CONFERENCE WITH TONY YANKEL RE: REVIEW OF TESTIMONY TO BE FILED IN THIS CASE
10/22/2008	ELO	185	5.3	980.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: FINAL CHANGES TO HIS TESTIMONY; TELEPHONE

				CONFERENCE WITH MARK MICKELSEN RE: SAME AND FINALIZE TESTIMONY; CONTINUED REVIEW OF COMP TESTIMONY; CONTINUE DRAFTING OF ERWIN TESTIMONY
10/23/2008 ELO	185	9.5	1,757.50	FINISH REVIEW OF COMPANY TESTIMONY; CONTINUE FINALIZING YANKEL TESTIMONY AND EXHIBITS; FI DRAFTING OF ERWIN TESTIMONY AND EMAIL FOR REVIEW
10/24/2008 ELO	185	7	1,295.00	FINALIZE TESTIMONY AND EXHIBITS AND SEE THAT ARE FILED AND MAILED OUT
10/27/2008 ELO	185	2	370.00	ORGANIZE IIPA FILE; REVIEW INTERVENOR TESTIM
10/28/2008 ELO	185	1.2	222.00	REVIEW STAFF TESTIMONY
11/11/2008 ELO	185	0.2	37.00	PREPARE DISCOVERY RESPONSES TO IPC
11/17/2008 ELO	185	0.5	92.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: IP RATE CASE STRATEGY; 11:30 TO 12:06; TELEPHON CONFERENCE WITH SID ERWIN RE: STATUS OF RATE CASE AND TESTIMONY
11/20/2008 ELO	185	1.6	296.00	PREPARE IIPA'S DISCOVERY RESPONSES TO IPC
11/21/2008 ELO	185	1.4	259.00	CONTINUED PREPARATION OF DISCOVERY REQUEST AND SEE THAT SAME IS SERVED
11/21/2008 PM	75	1.8	135.00	COLLATED MATERIALS FOR DISCOVERY RESPONSES AND SENT OUT
11/25/2008 ELO	185	0.3	55.50	REVIEW EMAIL ABOUT CONFERENCE CALL; RESPONSE WITH COPY OF NOTICE OF PUBLIC HEARINGS
12/1/2008 ELO	185	0.6	111.00	TELEPHONE CONFERENCE WITH DEAN STEVENSON RE: IPC RATE CASE AND TESTIFYING AT PUBLIC HEARINGS; TELEPHONE CONFERENCE WITH DAVE PICKETT RE: SAME
12/2/2008 ELO	185	2.2	407.00	REVIEW AND FINALIZE YANKEL REBUTTAL TESTIMONY
12/3/2008 ELO	185	2.7	499.50	CONFERENCE CALL WITH TONY YANKEL; CONTINUED REVIEW AND REVISION OF YANKEL'S REBUTTAL TESTIMONY; FINALIZE REBUTTAL TESTIMONY AND SE THAT SAME IF FILED AND SERVED ON THE PARTIES
12/4/2008 ELO	185	3.8	703.00	PREPARE TESTIMONY SUMMARY FOR PUBLIC HEARINGS
12/5/2008 ELO	185	1.4	259.00	FINALIZE TESTIMONY SUMMARY; CORRECT YANKEL'S REBUTTAL TESTIMONY; TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: GETTING TESTIMONY SUMMARY AND TAKING TO TWIN FALLS PUBLIC HEARING
12/8/2008 ELO	185	3.9	721.50	TELEPHONE CONFERENCE WITH TONY YANKEL DEVELOPMENT OF CROSS EXAMINATION OF COMPANY, STAFF AND INTERVENOR WITNESSES; CONTINUED REVIEW OF REBUTTAL TESTIMONY; REVIEW AND RESPOND TO E-MAIL RE: SCHEDULING OF WITNESSES FOR HEARING; CONTINUED REVIEW OF REBUTTAL TESTIMONY; PREPARE FOR PUBLIC HEARINGS; ATTEND PUC PUBLIC HEARINGS ON RATE CASE AT POCATELLO CITY HALL
12/9/2008 ELO	185	0.4	74.00	E-MAIL DEAN STEVENSON RE: TWIN FALLS HEARING TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: TWIN FALLS PUBLIC HEARINGS AND PROVIDING TESTIMONY SUMMARY
12/10/2008 ELO	185	2.9	536.50	CONTINUED REVIEW OF REBUTTAL TESTIMONY;
12/11/2008 ELO	185	8.5	1,572.50	CONTINUED REVIEW OF REBUTTAL TESTIMONY AND

12/12/2008 ELO	185	1.6	296.00	PREPARE CROSS EXAMINATION OF WITNESSES CONTINUED REVIEW OF REBUTTAL TESTIMONY AND PREPARE CROSS EXAMINATION OF WITNESSES; TELEPHONE CONFERENCE WITH TONY YANKEL RE: TESTIMONY; TELEPHONE CONFERENCE WITH SID ERWIN RE: TESTIMONY
12/13/2008 ELO	185	0.6	111.00	CONTINUED PREPARATION CROSS EXAMINATION FOR HEARINGS
12/14/2008 ELO	185	12	2,220.00	CONTINUED PREPARATION FOR TECHNICAL HEARINGS AND PREPARE CROSS EXAMINATION FOR WITNESSES
12/15/2008 ELO	185	3.5	647.50	TRAVEL TO BOISE, ID
12/15/2008 ELO	185	5.2	962.00	PREPARE FOR TECHNICAL HEARINGS
12/16/2008 ELO	185	9	1,665.00	ATTEND AND PARTICIPATE IN TECHNICAL HEARINGS
12/16/2008 ELO	185	1.8	333.00	ATTEND AND PARTICIPATE IN PUBLIC HEARINGS
12/17/2008 ELO	185	8.5	1,572.50	ATTEND AND PARTICIPATE IN TECHNICAL HEARINGS
12/18/2008 ELO	185	6.2	1,147.00	ATTEND AND PARTICIPATE IN TECHNICAL HEARINGS
12/19/2008 ELO	185	1.5	277.50	PART. IN TECHNICAL HEARINGS VIA CONF. CALL
1/2/2009 ELO	185	4	740.00	PREPARE INTEVENOR FUNDING APPLICATION
TOTAL FEES		149.8	27,515.00	

COSTS

12/11/2008			16.32	POSTAGE 12/03 - JEAN JEWELL - IDAHO PUBLIC UTILITIES
12/23/2008			273.78	RT MILEAGE POCATELLO-BOISE - 12/15-12/18 - ELO
12/23/2008			676.93	LODGING AND MEALS WHILE IN BOISE - 12/15-12/18 - ELO
TOTAL COSTS			967.03	

ATTACHMENT 2

<u>Date</u>		<u>Description</u>
July 1	2	Read testimony and review exhibits of Keen, Gale, and Brilz.
	4	Read testimony and review exhibits of Brilz, Drake, Keen.
	4	Read testimony and review exhibits of Smith, Miller, and Schwendiman.
	5	Read testimony and review exhibits of Said and Tatum.
	6	Develop additional interrogatories regarding meter reading errors and accuracy; review associated data and cases in the last 18 months dealing with the same; discussion with Barker of the Staff regarding outage information that is
15	3	Review hourly company data regarding all input and uses of the power to the system; become familiar with the documents and manipulate data so as to put it in usable form.
16	3	Review 2008 update to the Company's IRP from 2006; observe changes that impact the direction of the rate case for allocation purposes and for load management purposes.
17	2	Manipulate data regarding January 2006 purchases and sales as well as generation on an hourly basis in order to put it into a form that can be used to define which classes use generation and which classes have excess generation that can be used to sell power off system.
18	2	Manipulate data regarding January 2006 purchases and sales as well as generation on an hourly basis in order to put it into a form that can be used to define which classes use generation and which classes have excess generation that can be used to sell power off system.
21	2	Manipulate data regarding January 2006 purchases and sales as well as generation on an hourly basis in order to put it into a form that can be used to define which classes use generation and which classes have excess generation that can be used to sell power off system.
24	2	Manipulate data regarding January 2006 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour.
25	2	Manipulate data regarding January 2006 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour.
29	3	Manipulate data regarding June 2006 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour.

- 30 4 Manipulate data regarding June 2006 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour.
- 31 4 Manipulate data regarding June 2006 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour; balance hourly usage with allocated generation.
- Aug 1 3 Manipulate data regarding June 2006 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour; balance hourly usage with allocated generation.
- 14 6 Manipulate data regarding June 2006 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour; balance hourly usage with allocated generation.
- 15 6 Review data responses to Irrigators; review specific data regarding customers that had incorrect meter readings and compare with what is known from other information; review load data and hourly resource data in order to develop a means of comparing it with data responses regarding distribution outages.
- 18 6 Review load research data and impact of Irrigation Peak Rewards Program; conversation with Olsen regarding treatment of Irrigation Peak Rewards Program and data in this case; attempt to quantify impact of the Company's proposed treatment.
- 19 7 Manipulate data regarding Jan 2007 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour; balance hourly usage with allocated generation.
- 20 8 Manipulate data regarding Feb and Mar 2007 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour; balance hourly usage with allocated generation.
- 21 8 Manipulate data regarding Apr May 2007 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour; balance hourly usage with allocated generation.
- 22 8 Manipulate data regarding June July 2007 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour; balance hourly usage with allocated generation.
- 25 8 Manipulate data regarding Aug Sept 2007 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour; balance hourly usage with allocated generation.
- 26 8 Manipulate data regarding Oct Nov 2007 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour; balance hourly usage with allocated generation.

- 27 8 Manipulate data regarding Dec 2007 purchases and sales as well as generation on an hourly basis in order to put it into a form that summarizes use by day and by hour; balance hourly usage with allocated generation; Discussion with Irrigation Board regarding direction of case and the treatment of the load
- 28 7 Redevelop data regarding summarizing different function such as generation, retail, purchases MWh, purchases cost, sales MWh, and sales dollars into summary forms by day and by hour of the day. Identify highest monthly values for each category for each hour of the day.
- 29 6 Develop summaries of wholesale data by combining sales and purchase data on the basis of both cost and total energy. Check for and correct errors in data. Print out data in a reviewable form.
- 30 3 Review Irrigation Peak Rewards Program as proposed by Idaho Power for next Irrigation season; compare the Company option program to that being run by PacifiCorp.
- Sept 9 4 Review data regarding outages from specific Irrigator substations (Duffin and BUBR) in order to see if there is a correlation with high load times; review outage data of all substations in the aggregate.
- 10 4 Review Company data responses; develop method of calculating impact of usage by classes for which data was not provided on the need for purchase power or the ability to sell into the wholesale market.
- 12 4 Review Company data responses; develop method of calculating impact of usage by classes for which data was not provided on the need for purchase power or the ability to sell into the wholesale market.
- 15 3 Review data response to questions proposed by the Industrial users for impact on overall system costs and also impact upon the Irrigators.
- 16 5 Review data regarding interruptions on the Company's distribution system; review/establish usage of Irrigators on an hourly basis from the load research
- 17 3 Review load research data and convert it to hourly use data for the Irrigators as a class/schedule.
- 18 7 Review load research data and convert it to hourly use data for the Irrigators as a class/schedule.
- 19 2 Review load research data and convert it to hourly use data for the Irrigators as a class/schedule.
- 30 6 Review load research data and convert it to hourly use data for the Irrigators as a class/schedule.

- Oct 2 3 Review responses to data requests sent by Irrigators and others; review August 2008 IRP presentation.
- 3 5 Develop testimony regarding the impact of using hourly data to allocate Sales for Resale revenues and Purchase Power costs.
- 4 5 Compare impact of using hourly data to allocate Sales for Resale revenues and Purchase Power costs compared to the normalized way the company did it in the filing; finalize testimony regarding the impact of using hourly data to allocate Sales for Resale revenues and Purchase Power costs.
- 6 5 Go through old data and develop testimony for this case regarding the impact of growth on the system and the lack of growth by the Irrigators.
- 7 6 Develop an exhibit that weights generation and transmission demand data as well as energy data for purposed of putting it into a cost of service study; incorporate data into the Company's cost of service study and make all necessary adjustments so that the study will take the data; write testimony
- 8 5 Review various outage data and formulate groupings to evaluate data; combine with data from recent discovery request #35 to evaluate the general location of outages; assess the value of the data and resulting relationships.
- 9 6 Review various outage data and formulate groupings to evaluate data; combine with data from recent discovery request #35 to evaluate the general location of outages; assess the value of the data and resulting relationships.
- 10 7 Develop data associated with the impact of capacity available at specific hours for use as Sales for Resale; develop testimony regarding same.
- 11 4 Develop data associated with the impact of capacity available at specific hours for use as Sales for Resale; write testimony regarding same.
- 13 8 Review Peak Rewards program and its impact on cost of service; develop two cost of service studies that reflect impact of Peak Rewards program; write testimony regarding impact of Peak Rewards program.
- 14 7 Finalize draft testimony and exhibits; conversation with Hessing regarding testimony in the last case.
- 18 6 Rework testimony; clean up exhibits and put in final form.
- 21 1 Review final draft, conversation with Olsen regarding direction.
- 24 2 Review of testimony of Sid Erwin; multiple discussions with Olsen regarding my testimony and that of Erwin.
- Nov 3 2 Review testimony of CAPA; review orders and entries put out by the Commission in other cases.

- 4 4 Review testimony of Micron witness Peseau regarding cost allocation and rate spread; Review Peseau's testimony regarding revenue requirement and review basis of information he presented; Review testimony of DOE witness Goins regarding allocation of costs and spread of revenue requirement.
- 5 4 Review testimony of Industrial witness Reading and some of the Staff witnesses and develop comments on the testimony.
- 6 3 Review more testimony of the Staff as well as a number of data responses that were not reviewed during the last month.
- 7 3 Review recent data responses of the Company With emphasis on issues that impact irrigation allocations and demand side management issues.
- 10 4 Develop responses to the Company's discovery request to the Irrigators including finding cases where testimony was filed, reviewing past testimony that was filed, and developing a listing of the testimony and issues.
- 11 3 Review a number of discovery responses that were received over the last month that had not been reviewed; review Staff testimony as a basis for filing rebuttal testimony regarding cost allocation.
- 12 4 Review data from previous cases to follow Hessings assertion that the "disparity" in rates will continue in the future; try to determine how the disparity functioned in the past in order to see if it is the same as now.
- 13 4 Review a number of discovery responses that were received over the last month that had not been reviewed; review company testimony as a basis for filing rebuttal testimony regarding cost allocation.
- 28 7 Review the development of the exhibit prepared by Hessing in the last case and attempt to make the same adjustments , but including data from this case; analyze the impact of the Hessing example in this case.
- Dec 1 8 Review the development of the exhibit prepared by Hessing in the last case and attempt to make the same adjustments , but including data from this case; analyze the impact of the Hessing example in this case.
- 2 8 Write rebuttal testimony regarding revenue spread; address testimony of Hessing in the last case and his example of growth in just one class; address testimony of Staff witnesses Lobb and Hessing from this case; address direct testimony of Peseau and Reading from this case.
- 3 6 Conversations with Olsen regarding testimony; rewrite testimony; finalize
- 4 7 Review all of the rebuttal testimony filed in the case; prepare for what I expect to have to address on crossexamination; develop thoughts on our approach to cross of other witnesses and the areas to address.

5	8	Review testimony of Company witness Tatum regarding my proposed cost of service method for addressing growth and develop suggested crossexamination.
8	8	Review testimony of Kroger witness Higen and develop suggested crossexamination regarding his comments on cost allocation as well as his comments on my sales for resale proposal.
9	8	Review testimony of Department of Energy witness Goins regarding his comments on my proposed allocation of growth related costs and his suggestion that I used vintage pricing; develop suggested crossexamination for Goins.
10	6	Review testimony of Staff witness Hessing regarding his thoughts on the ability or desirability to allocate the cost of growth and develop suggested crossexamination.
11	3	Discussions with Olsen regarding crossexamination; review of testimony of witnesses Reading and Peseau.
15	6	Review testimony of others; review my testimony; prepare for
16	8	Travel to Boise for the hearing; review testimony of others in preparation of being cross-examined; attend hearing; meet with Olsen regarding directions of the hearing.
17	8	Attend hearing and submit to crossexamination; assist in crossexamination of witnesses; discussions with Irrigators regarding direction of case.
18	6	Prepare for hearing; attend hearing.
Total	376	

TRAVEL EXPENSE

Date	Lodging	Meals	Transportation
16-Dec		\$45.00	\$519.99 Air Line
17-Dec		\$45.00	
18-Dec		\$45.00	
19-Dec		\$45.00	\$312.68 car
			\$34.00 parking
Subtotals	\$0.00	\$135.00	\$866.67
		Total Travel Expense	\$1,001.67