

✓ Gen Bek sent 11/24/08 No A.V. No Commos. ? H

Jean Jewell

From: bradw@willsinc.com
Sent: Friday, November 21, 2008 2:29 AM
To: Jean Jewell; Beverly Barker; Gene Fadness; Ed Howell
Subject: PUC Comment Form

A Comment from Brad Wills follows:

Case Number: IPC-E-08-22
Name: Brad Wills
Address: 222 Shoshone St. West
City: Twin Falls
State: Idaho
Zip: 83303-0346
Daytime Telephone: 208-734-4411
Contact E-Mail: bradw@willsinc.com
Name of Utility Company: Idaho Power Company Add to Mailing List: yes

Please describe your comment briefly:

- This filing is based on the false premise that development doesn't pay its own way. Vested Interest and subdivision lot refunds were created by Idaho Power Co. as an equitable program to assist the Developer's large capital investment while improving the Facilities and Line Transmission of Idaho Power Co. After reviewing the filing and the Testimony of Idaho Power Employees: Mr. Gregory W. Said and Mr. David R. Lowry, the main argument is that Local Municipalities or Highway Districts are not covering their responsibility of their Right of Ways and that this cost should be shifted on to the local Developer.
- Over the past few years as a group of developers in one area, we have paid Idaho Power Co. hundreds of thousands of dollars to upgrade off-site transmission lines to service our subdivisions located a mile away. We don't use a municipality's power to request improvements to the existing Idaho Power Co. Facilities as a means to service our subdivisions and this Rate Increase's testimony uses this as an example for the need to eliminate refunds and reduce the time of the Vested Interest Pay back.
- It is our argument that the time limit on the Off-site Vested Interest should be changed from the 5 year period to 15-20 years to be fair and equitable to the Developer that choose to invest in a major upgrade to Idaho Power Co.'s facilities and transmission lines with the understanding that Developer would be allowed to recover part of that large investment at a later date. Otherwise, Idaho Power Co. is the benefactor of the Developer's investment and the next Developer doesn't bare any of the cost of improving the availability of Idaho Power Co. service to that particular area if he waits long enough. Local City payback periods for Sewer and Water averages 20 years.
- Discussing the lot refunds of \$ 800.00 with a fellow Developer, he commented that sometimes that is the only profit on the Development. Again this is a program that was thought to be equitable with the Developer to help off-set the large capital investment of improving a subdivision and was created by Idaho Power Co. It appears that Idaho Power Co is attempting to shift an additional cost to an unrelated development to cover unfunded requests from the Highway Districts and Local Municipalities for improvements to their Right of Ways.
- We respectfully request that this Filing not be approved for a Modified Procedure and to allow the hearing process and that this request be denied or amended to only lengthen the Vested Interest Period to 20 years.

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 68.5.163.50