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IDAHO PUBLIC
UTILITIES COMMISSION

DONOVAN E. WALKER
Corporate Counsel

November 25, 2008

VIA HAND DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
P.O. Box 83720
Boise, Idaho 83720-0074

Re: Case No. IPC-E-08-23

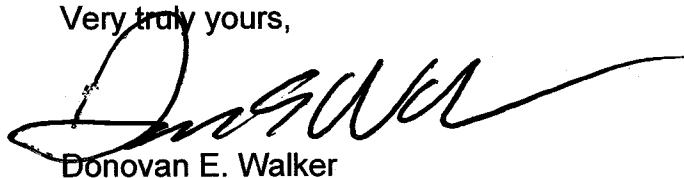
**IN THE MATTER OF IDAHO POWER COMPANY'S PETITION FOR
APPROVAL OF CHANGES TO THE IRRIGATION PEAK REWARDS
PROGRAM, AND FOR AUTHORITY TO RECOVER THE COST OF THE
PROGRAM IN THE PCA**

Dear Ms. Jewell:

Enclosed please find for filing an original and seven (7) copies of Idaho Power's Motion to Bifurcate and Shorten Time in the above matter.

I would appreciate it if you would return a stamped copy of this letter for Idaho Power's file in the enclosed stamped, self-addressed envelope.

Very truly yours,



Donovan E. Walker

DEW:csb
Enclosures

DONOVAN E. WALKER (ISB No. 5921)
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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Idaho Power Company

Street Address for Express Mail:
1221 West Idaho Street
Boise, Idaho 83702

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S PETITION FOR APPROVAL)	CASE NO. IPC-E-08-23
OF CHANGES TO THE IRRIGATION)	
PEAK REWARDS PROGRAM, AND FOR)	MOTION TO BIFURCATE AND
AUTHORITY TO RECOVER THE COST)	SHORTEN TIME
OF THE PROGRAM IN THE PCA)	
)	

COMES NOW, Idaho Power Company ("Idaho Power" or "Company") and, in accordance with RP 56 and RP 256, hereby moves the Commission to bifurcate the issues presented in the Company's Petition and to consider each issue using separate procedural tracks. The Company requests that: (1) the Irrigation Peak Rewards Program ("Program") settlement Stipulation be Noticed for Modified Procedure, with a fourteen-day comment period, and (2) the Company's request to recover the cost of the Program incentives in its Power Cost Adjustment ("PCA") mechanism be Noticed and a

fourteen-day intervention period be commenced. This Motion is a request for procedural relief, and the Company requests that the Commission act upon it on less than 14 days notice at the December 1, 2008, Decision Meeting. This Motion is based on the following:

1. On November 7, 2008, Idaho Power filed a Petition requesting (1) authorization to modify the Irrigation Peak Rewards Program consistent with the terms of the settlement Stipulation signed by Staff, the Company, and the Idaho Irrigation Pumpers Association ("Parties") and (2) to allow the Company to recover the cost of the Program incentives in its Power Cost Adjustment. The Company requested that its Petition be processed by Modified Procedure. On November 19, 2008, Staff filed a memorandum with the Commission recommending that the Petition be processed by Modified Procedure with a 45-day comment period.

2. During subsequent discussions between the Company and Staff regarding procedure, it was agreed that if the issues were bifurcated into (1) consideration of the Stipulation and (2) consideration of the funding mechanism for cost recovery of the Program, then the Stipulation could be processed by Modified Procedure with a fourteen-day comment period and the cost recovery issues could be Noticed for an intervention period of 14 days, after which a further procedural schedule could be discussed by all parties and presented to the Commission for consideration of the cost recovery issues.

3. In order for the Company to meet its obligations under the Stipulation to market and implement the revised Program for the 2009 irrigation season, the Company requests an Order be issued regarding the Stipulation by January 1, 2009. Because the

cost recovery mechanism was not part of the Stipulation signed by the Parties, it would be appropriate to bifurcate that issue, and seek intervention from interested persons before moving forward with the consideration of those issues. At the same time, considering the issue of the signed Stipulation on a separate basis may allow the Company the additional time it needs this winter to properly market and implement the Program for the 2009 irrigation season.

4. The Company and Staff have discussed this Motion and its contents, and are in agreement. The Company has discussed this Motion and its contents with counsel for the Idaho Irrigation Pumpers Association, and they do not object. Both the Staff and the Idaho Irrigation Pumpers Association have been served with copies of this Motion. Because of the time constraints imposed by the intervening Thanksgiving and Christmas holidays, as well as the technical hearing scheduled for Idaho Power's Rate Case, pursuant to RP 256.03, the Company requests that the Commission act on this Motion on less than 14 days notice at the next regularly scheduled Decision Meeting on Monday, December 1, 2008. The signatories to the Stipulation have been given actual notice of this Motion, and if bifurcated, an intervention period and further procedure will be established for the remaining portion of the case.

NOW, THEREFORE, Idaho Power respectfully moves the Commission to: (1) act on this motion in less than 14 days notice at the December 1, 2008, Decision Meeting; (2) bifurcate the issues presented in the Company's Petition, and consider each issue using separate procedural tracks; (3) process the Stipulation by Modified Procedure, with a fourteen-day comment period; and (4) process the Company's request to recover the cost of the Program incentives in its Power Cost Adjustment

mechanism by initially setting a fourteen-day intervention period. Following the intervention period, the parties could discuss further procedure for the consideration of the cost recovery issues and present their recommendation to the Commission.

Respectfully submitted this 25th day of November 2008.

A handwritten signature in black ink, appearing to read "Don Walker", written over a horizontal line.

DONOVAN E. WALKER
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of November 2008 I served a true and correct copy of the within and foregoing MOTION TO BIFURCATE AND SHORTEN TIME upon the following named parties by the method indicated below, and addressed to the following:

Commission Staff

Weldon Stutzman
Deputy Attorney General
Idaho Public Utilities Commission
472 West Washington
P.O. Box 83720
Boise, Idaho 83720-0074

☒ Hand Delivered
☐ U.S. Mail
☐ Overnight Mail
☐ FAX
☒ Email weldon.stutzman@puc.idaho.gov

**Idaho Irrigation Pumpers
Association, Inc.**

Eric L. Olsen
RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED
P.O. Box 1391
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Donovan E. Walker