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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 COMPANY'S PETITION FOR ) **CASE NO. IPC-E-08-23**  
APPROVAL OF CHANGES TO THE )  
IRRIGATION PEAK REWARDS PROGRAM )  
\_\_\_\_\_ )

**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, regarding the expenses and costs associated with the Irrigators participation in the above referenced matter, 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) As part of the stipulation settling the 2007 rate case, Idaho Power, the Irrigators and Commission Staff agreed to address the issues that the Irrigators had raised in that proceeding

regarding improving Idaho Power's Peak Rewards Program (the "Program"). On June 11, 2008, the parties gathered in Heyburn, Idaho to initially discuss suggested changes to the Program. Presentations were made by both Idaho Power and Irrigator representatives at that meeting. After the initial meeting, Idaho Power prepared a proposal to modify the existing Program to include a dispatchable option. Several conference calls were held to vet the specifics of the dispatchable program proposal with Idaho Power, the Irrigators and Commission Staff. The parties discussions were set out in the Stipulation that was incorporated into the Petition that Idaho Power filed with the Commission on November 10, 2008.

The Irrigators' President, Mark Mickelsen, its Vice President, Sidney Erwin, its Executive Director, Lynn Tominaga, and Board Member, Dean Stevensen, its legal counsel, Eric L. Olsen, and its consultant, Anthony J. Yankel, P.E., all fully participated in the meetings and conference calls that resulted in the Stipulation and Petition in this case. The Irrigators have also filed supporting testimony for the Stipulation.

The Stipulation calls for the continued offering of the timer-based load control program and the addition of a new dispatchable load control program via one-way or two-way communication devices. Under the new dispatchable program, Idaho Power can interrupt participating irrigation pumps for a specified number of hours per week between June 15 and July 31 ("Program Season"). In exchange for allowing Idaho Power to interrupt service, participating customers will receive a bill credit in their monthly bills they obtain during the Program Season. The Stipulation's terms and conditions were worked out collaboratively between the Irrigators, Idaho Power, and Commission Staff. The Irrigators believe that the addition of the dispatchable program will expand the amount of summer peak being shaved above the current 40 MW enjoyed to potentially well over 200 MW

as now being realized under the Rocky Mountain Power dispatchable program. The Irrigators believe that this new dispatchable program is cost effective demand response program that should be adopted by the Commission.

(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 corresponding and collaborating with Idaho Power and the Commission Staff, gathering information and reviewing documentation regarding the Program, preparing for, delivering, and attending the June 11, 2008 presentation, drafting a memorandum setting out the Irrigators' concerns with Idaho Power's proposals, and reviewing and commenting on the Stipulation and revisions to rate schedules.

(D) The costs described in Paragraph (A) above constitute a financial hardship for the Irrigators. The Irrigators currently have approximately \$20,000.00 in the bank with outstanding accounts payable from participation in this case, the current Idaho Power rate case and the Rocky Mountain Power Rate case totaling approximately \$30,000.00. These payables will increase dramatically due to the fact that the current Idaho Power rate case is going to a full hearing next week.

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 are 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 this review and settlement regarding the Irrigation Peak Rewards Program. As a result of financial constraints, participation in review and settlement has been selective and, primarily, on a limited basis.

(E) The positions that the Irrigators have urged the Commission to adopt were supported and adopted by the Commission Staff in the Stipulation. In particular, the Irrigators worked hard to get broad input from the irrigation community at the June 11, 2008 meeting by getting a broad cross section of irrigators to attend. The Irrigators closely reviewed Idaho Power's proposals on the dispatchable program and made suggested changes to the new program, such as, not limiting participation to irrigators with certain pump horsepower thresholds, keeping the installation costs to a reasonable threshold to encourage participation, agreeing to greater weekly interruption than found on the Rocky Mountain Power program (15 hours versus 12 hours), and requiring that the new program be actively marketed by Idaho Power providing irrigation customers information how much

they would save by joining the new program based on the previous year's usage levels. These items were all aimed at ensuring sufficient participation in the new dispatchable program.

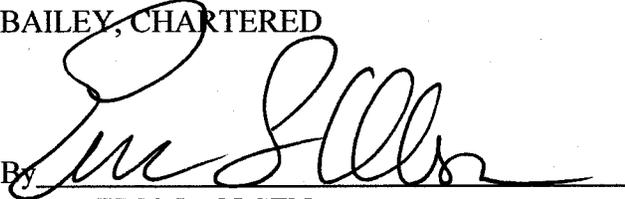
(F) The Irrigators' participation addressed issues of concern to the general body of users or consumers on Idaho Power's system. The Peak Rewards Program has enabled Idaho Power to shave approximately 40 MW of load during the summer system peak. This reduction in peak load benefits all Idaho Power customer classes by reducing the overall system costs. Idaho Power estimates that the dispatchable program should raise the shaved load to approximately 112 MW. The Irrigators believe that amount of interruption will be more like what is currently on the Rocky Mountain Power system or over 200 MW. This will program help slow down the need for new generation capacity on the Idaho Power system and hopefully help reduce the frequency of Idaho Power's general rate cases.

(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 the 12<sup>th</sup> day of December, 2008.

RACINE, OLSON, NYE, BUDGE &  
BAILEY, CHARTERED

By 

ERIC L. OLSEN

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24<sup>th</sup> day of December, 2008, I 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:

Jean Jewell  
Idaho Public Utilities Commission  
472 W. Washington Street  
P.O. Box 83720  
Boise, Idaho 83720-0074  
E-mail: [jean.jewell@puc.idaho.gov](mailto:jean.jewell@puc.idaho.gov)

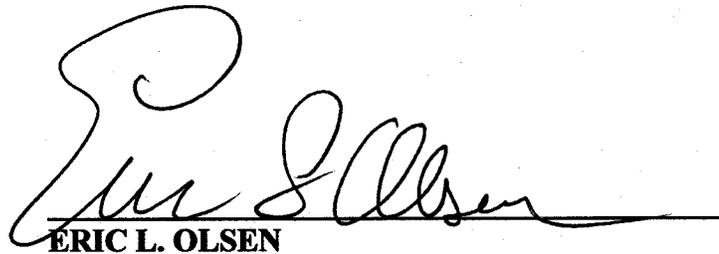
U.S. Mail/Postage Prepaid

Barton L. Kline  
Donovan Walker  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707-0070  
E-mail: [bkline@idahopower.com](mailto:bkline@idahopower.com)  
E-mail: [dwalker@idahopower.com](mailto:dwalker@idahopower.com)

U.S. Mail/Postage Prepaid

Weldon Stutzman  
Neil Price  
Deputy Attorney Generals  
Idaho Public Utilities Commission  
472 W. Washington (83702)  
P.O. Box 83720  
Boise, ID 83720-0074  
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U.S. Mail/Postage prepaid



**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):	50.0 hrs @ \$175.00 per hour	\$ 8,750.00
	Jason E. Flaig (Associate):	5.4 hrs @ \$125.00 per hour	\$ 675.00
	Costs:		\$ <u>0.00</u>
	Total Work and Costs:		<u>\$ 9,425.00</u>
2.	Consultant Fees:		
	Anthony J. Yankel:	147 hrs @ \$125 per hour	\$18,375.00
	Expenses:		
	Travel, room and meals		\$ <u>1,072.88</u>
	Total Work and Costs:		<u>\$19,447.88</u>
	<b>TOTAL FEES AND EXPENSES:</b>		<b>\$28,872.88</b>

**Attachment 1**

RACINE OLSON NYE BUDGE & BAILEY, CHARTERED

IDAHO IRRIGATION PUMPERS ASSOCIATION

710.1518532

FEE DATE	ATTORNEY	RATE	HOURS TO BILL	AMOUNT	DESCRIPTION
4/17/2008	ELO	175	0.5	\$ 87.50	CALL AND LEAVE MESSAGES WITH SID IRWIN, JEFF PAHL AND MARK MICKELSEN RE: IDAHO POWER WORKSHOP ON PEAK REWARDS PROGRAM; CALL AND LEAVE MESSAGE WITH TIM TATUM WITH IDAHO POWER; TELEPHONE CONFERENCE WITH TIM TATUM RE: SCHEDULING MEETING
4/18/2008	ELO	175	1.5	\$ 262.50	DRAFT EMAIL TO MEMBERS AND EXECUTIVE COMMITTEE RE: IPC PEAK REWARDS WORKSHOPS; TELEPHONE CONFERENCE WITH RANDY LOBB RE: SAME AND PCA; EMAIL TONY YANKEL RE: SAME; CA AND LEAVE MESSAGE WITH MAGGIE BRILZ
4/21/2008	ELO	175	0.5	\$ 87.50	CALL AND LEAVE MESSAGE WITH SID ERWIN; TELEPHONE CONFERENCE WITH TONY YANKEL RE: UPCOMING WORK SHOP ON PEAK REWARDS; CALL AND LEAVE MESSAGE WITH MAGGI BRILZ; TELEPHON CONFERENCE WITH DAVE SCHUNKE OF PUC STAFF
4/22/2008	ELO	175	0.9	\$ 157.50	TELEPHONE CONFERENCE WITH DAVE SCHUNKE RE: COLLABORATIVELY WORKING ON INTERRUPTION WORKSHOP RATE DESIGN ISSUES
4/24/2008	ELO	175	1.1	\$ 192.50	TELEPHONE CONFERENCE WITH SID ERWIN RE: IDAH POWER PEAK REWARDS PROGRAM
4/30/2008	ELO	175	0.4	\$ 70.00	TELEPHONE CONFERENCE WITH SID ERWIN RE: IPC PEAK REWARDS PROGRAM AND UPCOMING MEETING
5/2/2008	ELO	175	0.7	\$ 122.50	TELEPHONE CONFERENCE WITH SID ERWIN RE: IDAH POWER PEAK REWARDS PROGRAM
5/5/2008	ELO	175	0.8	\$ 140.00	GET INFORMATION FOR SID ERWIN ON RMP DISPATCHABLE PROGRAM
5/5/2008	ELO	175	0.4	\$ 70.00	TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: UPDATE ON IIPA MATTERS; TELEPHONE CONFERENCE WITH RANDY LOBB RE: INTERRUPTIBILITY TELEPHONE CONFERENCE WITH TONY YANKEL RE: SAME; PARTICIPATE IN CONFERENCE CALL WITH IDAHO POWER RE: SAME
5/13/2008	ELO	175	0.5	\$ 87.50	TELEPHONE CONFERENCE WITH SID ERWIN PEAK REWARDS ISSUES
5/14/2008	ELO	175	1.1	\$ 192.50	GET INFORMATION FOR PEAK REWARDS WORKSHOP; TELEPHONE CONFERENCE WITH SYDNEY ERWIN RE: INFORMATION; REVIEW AND REVISE COMMENTS ON PCA FILING
5/15/2008	ELO	175	0.4	\$ 70.00	GATHER ADDRESSES FOR OFFICERS AND DIRECTORS AND EMAIL SAME TO IDAHO POWER
5/20/2008	ELO	175	1.5	\$ 262.50	REVIEW PEAK REWARDS INFORMATION IN PREPARATION FOR CONFERENCE CALL
5/21/2008	ELO	175	2	\$ 350.00	PREPARE FOR IIPA MEETING; PARTICIPATE IN CONFERENCE CALL WITH IIPA'S EXECUTIVE BOARD
5/29/2008	ELO	175	0.3	\$ 52.50	REVIEW DRAFT OF PEAK REWARDS PRESENTATION

FEE DATE	ATTORNEY	RATE	HOURS TO BILL	AMOUNT	DESCRIPTION
6/2/2008	ELO	175	0.1	\$ 17.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: IDAHO POWER AND PACIFICORP INTERPRETABILITY PROGRAMS
6/3/2008	ELO	175	0.4	\$ 70.00	TELEPHONE CONFERENCE WITH TONY YANKEL RE: REVIEW OF PRESENTATION AND CONFERENCE WITH IDAHO POWER; EMAIL LYNN AND SID RE: IPC PRESENTATION
6/10/2008	ELO	175	2.5	\$ 437.50	REVIEW IDAHO POWER PRESENTATION FOR PEAK REWARDS MEETING; TELEPHONE CONFERENCE WITH TONY YANKEL RE: SAME AND FORWARD EMAIL TO YANKEL AND OTHER BOARD MEMBERS; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: SAME; TELEPHONE CONFERENCE WITH SID IRWIN RE: MEETING AND ISSUES TO BE ADDRESSED
6/11/2008	ELO	175	6	\$ 1,050.00	PREPARE FOR MEETING WITH IPC; ATTEND PEAK REWARDS MEETING
6/11/2008	ELO	175	2	\$ 350.00	TRAVEL TO AND FROM BURLEY
6/13/2008	ELO	175	0.4	\$ 70.00	TELEPHONE CONFERENCE WITH TONY YANKEL RE: IP MEETING AND GETTING DISCOVERY INFORMATION
7/31/2008	ELO	175	0.3	\$ 52.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: RMP INTERRUPTIBILITY PRICING ISSUES
8/13/2008	ELO	175	0.8	\$ 140.00	CALL AND LEAVE MESSAGE WITH TIM TATUM OF IDAHO POWER RE: PEAK REWARDS PROGRAM MEETING FOLLOWUP; TELEPHONE CONFERENCE WITH TIM TATUM RE: SAME; TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: SAME
8/14/2008	ELO	175	0.4	\$ 70.00	REVIEW THE DISPATCHABLE INFORMATION
8/15/2008	ELO	175	1.9	\$ 332.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: IDAHO POWER PEAK REWARDS PROGRAM; EMAIL LYNN TOMINAGA RE: POSSIBLE EDITORIAL ARTICLE TELEPHONE CONFERENCE WITH SID IRWIN RE: IPC PEAK REWARDS PROGRAM; TELEPHONE CONFERENCE WITH BRENDA TOMINAGA RE: PREPARING EDITORIAL
8/26/2008	ELO	175	0.7	\$ 122.50	PARTICIPATE IN CONFERENCE CALL RE: PEAK REWARDS PROGRAM AND IPCO RATE CASE
8/27/2008	ELO	175	0.2	\$ 35.00	TELEPHONE CONFERENCE WITH TIM TATUM RE: STATUS OF COMPANY PROPOSAL FOR DEMAND RESPONSE PROGRAM
9/2/2008	ELO	175	0.7	\$ 122.50	REVIEW IPC DISPATCHABLE PROGRAM PAPER; REVIEW YANKEL'S COMMENTS RE; SAME; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: IPC PEAK REWARDS RESPONSE; EMAIL IPC INFORMATION TO DEAN STEVENSON
9/5/2008	ELO	175	0.3	\$ 52.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: PCA WORKSHOP AND PEAK REWARDS PROGRAM
9/8/2008	ELO	175	0.6	\$ 105.00	CONFERENCE CALL WITH IIPA EXECUTIVE BOARD RE REVIEW OF CHANGES TO PEAK REWARDS PROGRAM
9/8/2008	ELO	175	2.2	\$ 385.00	PARTICIPATE IN CONFERENCE CALL WITH IPC AND STAFF; CONFERENCE CALL WITH EXECUTIVE COMMITTEE RE: SAME
9/10/2008	ELO	175	0.8	\$ 140.00	REVIEW NOTES FROM MEETING; TELEPHONE CONFERENCE WITH TONY YANKEL RE: IIPA PEAK

FEE DATE	ATTORNEY	RATE	HOURS TO BILL	AMOUNT	DESCRIPTION
					REWARDS PROGRAM
9/17/2008	ELO	175	2.5	\$ 437.50	DRAFT ISSUES MEMORANDUM SETTING OUT IIPA'S CONCERNS WITH IPC PEAK REWARDS PROPOSAL
9/18/2008	ELO	175	0.2	\$ 35.00	TELEPHONE CONFERENCE WITH TONY YANKEL REVIEW OF PEAK REWARDS MEMORANDUM
9/24/2008	ELO	175	0.3	\$ 52.50	EMAIL TIM TATUM AT IPC RE: RESPONDING TO PROPOSAL; TELEPHONE CONFERENCE WITH SIDS WIFE RE: MEMORANDUM AND RESEND MEMORANDUM TO NEW EMAIL ADDRESS
9/24/2008	ELO	175	1	\$ 175.00	TELEPHONE CONFERENCE WITH SID ERWIN RE: COMMENTS ON MEMORANDUM; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: SAME; REVISE MEMORANDUM AND EMAIL IT OUT
9/26/2008	ELO	175	0.6	\$ 105.00	FINALIZE MEMORANDUM ON PEAK REWARDS PROPOSAL; EMAIL MEMORANDUM TO IPC AND COMMISSION STAFF; ORGANIZE FILE
9/30/2008	ELO	175	0.7	\$ 122.50	CALL EXECUTIVE BOARD; TELEPHONE CONFERENCE WITH TIM TATUM RE: CONFERENCE CALL RE: IIPA' COMMENTS ON PROGRAM PROPOSAL
10/1/2008	ELO	175	2.6	\$ 455.00	TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: CONFERENCE CALL ON PEAK REWARDS PROGRAM; TELEPHONE CONFERENCE WITH SID ERWIN RE: SAME PREPARE FOR CONFERENCE CALL; TELEPHONE CONFERENCE WITH IIPA EXECUTIVE BOARD; IPC REPRESENTATIVES AND COMMISSION STAFF
10/23/2008	ELO	175	1.5	\$ 262.50	REVIEW STIPULATION AND MATERIALS; FORWARD ON
10/30/2008	ELO	175	2.6	\$ 455.00	FINALIZE REVIEW OF STIPULATION AND SUPPORTING DOCUMENTS AND EMAIL COMMENTS TO DONOVAN WALKER
11/4/2008	ELO	175	0.5	\$ 87.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: PREPARATION OF TESTIMONY FOR PEAK REWARDS; CALL AND LEAVE MESSAGE WITH DONOVAN WALKER RE: SAME
11/5/2008	ELO	175	0.5	\$ 87.50	REVIEW YANKEL TESTIMONY AND EMAIL COMMENTS
11/6/2008	ELO	175	0.5	\$ 87.50	FINALIZE TESTIMONY SUPPORTING THE STIPULATION FOR FILING
11/18/2008	ELO	175	0.1	\$ 17.50	TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: STATUS OF PEAK REWARDS FILING
11/24/2008	ELO	175	0.2	\$ 35.00	REVIEW COMMISSION SCHEDULE AND DECISION MEMO RE: PEAK REWARDS FILING; EMAIL WELDON STUTZMAN RE: SAME
11/25/2008	ELO	175	0.2	\$ 35.00	REVIEW VOICE MAIL FROM DONOVAN WALKER RE: PROCEDURAL ISSUES; CALL AND LEAVE MESSAGE RE: SAME
12/3/2008	JEF	125	0.2	\$ 25.00	DRAFTED APPLICATION FOR INTERVENOR FUNDING
12/8/2008	JEF	125	4.5	\$ 562.50	CONTINUED DRAFTING APPLICATION FOR INTERVENOR FUNDING; CONFERENCE WITH ELO AND DANA RE: APPLICATION PREPARATION AND ITEMIZED TIME ENTRIES
12/9/2008	JEF	125	0.7	\$ 87.50	CONTINUED DRAFTING THE APPLICATION FOR INTERVENOR FUNDING
12/12/2008	ELO	175	3.1	\$ 542.50	FINALIZED APPLICATION FOR INTERVENOR FUNDING
<b>TOTAL FEES</b>			55.4	\$ 9,425.00	<b>IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. 2008 IDAHO POWER GENERAL RATE CASE FILING</b>

**Attachment 2**

	<u>Date</u>	<u>IPCo</u>	<u>Description</u>
April	21	3	Review historic positions put out by Idaho Power regarding the Peak Rewards program.
	22	7	Review PacifiCorp's study regarding various DSM measures published in July 2007; review PacifiCorp's 2007 IRP for cost of new generation and similarities to the special DSM study; Review Idaho Powers 2005 IRP regarding cost of new generation and DSM.
	23	6	Review PacifiCorp's study regarding various DSM measures published in July 2007; Review Idaho Powers 2005 IRP regarding cost of new generation and DSM; Review Idaho Power's cases regarding certificate of convenience and necessity for the rate basing of the Evander Andrews expansion project and how the need and cost impacts may have related to the Irrigation Peak Rewards program.
	24	6	Review the Order in Idaho Power's application for a Residential Air Conditioner Cycling Program; review an independent study of the results of the Residential Air Conditioner Cycling Program; find data sources that describe the present level of the Residential program.
	28	6	Review findings and other material regarding interruptibility programs and write a summation of possible directions to pursue.
May	13	2	Review study regarding the costs and the benefits of the load management programs that was prepared for PacifiCorp last summer.
	14	4	Develop calculations and manipulate data for 2007 of all irrigation bills for each month in order to consolidate by size and load factor.
	15	4	Develop calculations and manipulate date for 2007 of all irrigation bills for each month in order to consolidate by size and load factor.
	16	4	Develop calculations and manipulate date for 2006 of all irrigation bills for each month in order to consolidate by size and load factor.
	19	4	Develop calculations and manipulate data for 2007 of all irrigation bills (non-company redacted version) for each month in order to consolidate by size and load factor.
	20	5	Compare results of the 2007 Irrigation monthly billing data for the two versions of the data supplied by the Company; highlight differences in the two sets of data by size and load factor; analyze data in more detail to determine the difference between the data sets; write memo regarding findings; further conversations with Idaho Power regarding the data.

<u>Date</u>	<u>IPCo</u>	<u>Description</u>
21	3	Prepare for and participate in conference call with Olsen and the Irrigation Board regarding the peak rewards program.
23	3	Develop comparisons of Irrigation peak curtailment programs in Idaho Power and PacifiCorp; review historical studies as well as tariffs.
27	6	Develop PowerPoint presentation that depicts how the Idaho Power and the PacifiCorp Irrigation curtailment programs work and develop supporting materials.
28	6	Develop PowerPoint presentation that depicts how the Idaho Power and the PacifiCorp Irrigation curtailment programs work and develop supporting materials.
June 2	5	Review data requests and requests sent to Idaho Power; review spreadsheet data sent by the Company that would be the foundation of their phone conversation; prepare for and attend phone conversation with Idaho Power personnel regarding the 2007 Irrigation Peak Rewards program data; phone conversation with Idaho Power; review of data sent by the company in light of the conversation that took place.
6	4	Review PowerPoint and make final adjustments for sending to Idaho Power and the Staff.
7	6	Travel from Cleveland to Boise for meetings in Idaho regarding Irrigation Peak Rewards program meeting with Idaho Power.
10	2	Prepare for and meet with Staff regarding the proposed presentation and Irrigator's position regarding Idaho Power's Peak Rewards Program.
11	9	Travel to and from as well as attend meeting in Burley with the Company, invited irrigators, and the Staff.
12	6	Travel from Boise to Cleveland; review material provided by Idaho Power at the meeting and assess its impact upon the direction we wish to take regarding the Irrigation Peak Rewards program.
July 16	3	Review 2008 update to the Company's IRP from 2006; observe changes that impact the direction of the rate case for load management purposes.
Aug 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 rate case; attempt to quantify impact of the Company's proposed treatment.
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.

	<u>Date</u>	<u>IPCo</u>	<u>Description</u>
Sept	1	2	Finalize thoughts regarding Idaho Powers proposed Peak Rewards Program changes for next year and write a summary/response for the Irrigators.
	6	6	Review IPCo's proposed Company Option Peak Rewards Program and develop numbers and impacts of the proposal; run through the Company's cost of service study in order to calculate the impact of IPCo's proposal to remove the impact of the Peak Rewards Program from the study, i.e. use data as if the interruption never happened.
	8	4	Prepare for meeting with Irrigators regarding Company proposed peak rewards program; attend phone conference of Irrigators regarding proposed peak rewards program; attend phone meeting with Company and Staff regarding peak rewards program; follow-up conversation with Irrigators regarding proposed peak rewards program.
Oct	1	2	Prepare for meeting and attend meeting with IPCo, Staff and the Irrigators regarding the proposed peak rewards program design.
	11	4	Develop data associated with the impact of capacity available at specific hours for use as Sales for Resale.
	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.
	27	2	Review proposed filing by IPCo regarding the new Irrigation load management program, including tariff changes, discussion of issues, IRP avoided cost, and proposed stipulation.
Nov	5	4	Draft testimony regarding support for the Idaho Peak Rewards program based upon the cost/benefit study provided by the Company and other data sources regarding the program.
	6	2	Review Idaho Power's proposed Peak Rewards program and finalize testimony based upon the cost/benefit study provided by the Company.
	Total		147

TRAVEL EXPENSE

Date	Lodging	Meals	Transportation
13-Jun		\$45.00	\$625.20 Air Line
14-Jun		\$45.00	
15-Jun		\$45.00	\$312.68 car
Subtotals	\$0.00	\$135.00	\$937.88

Total Travel Expense \$1,072.88