

LAW OFFICES OF

**RACINE OLSON NYE BUDGE & BAILEY  
CHARTERED**

W. MARCUS W. NYE  
RANDALL C. BUDGE  
JOHN A. BAILEY, JR.  
JOHN R. GOODELL  
JOHN B. INGELSTROM  
DANIEL C. GREEN  
BRENT O. ROCHE  
KIRK B. HADLEY  
FRED J. LEWIS  
ERIC L. OLSEN  
CONRAD J. AIKEN  
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DAVID E. ALEXANDER  
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STEPHEN J. MUHONEN  
BRENT L. WHITING  
JONATHON S. BYINGTON  
DAVE BAGLEY  
CAROL TIPPI VOLYN  
THOMAS J. BUDGE  
CANDICE M. MCHUGH  
JONATHAN M. VOLYN  
MARK A. SHAFFER

201 EAST CENTER STREET  
POST OFFICE BOX 1391  
POCATELLO, IDAHO 83204-1391

TELEPHONE (208) 232-6101  
FACSIMILE (208) 232-6109

[www.racinelaw.net](http://www.racinelaw.net)

SENDER'S E-MAIL ADDRESS: [elo@racinelaw.net](mailto:elo@racinelaw.net)

**BOISE OFFICE**  
101 SOUTH CAPITOL  
BOULEVARD, SUITE 208  
BOISE, IDAHO 83702  
TELEPHONE: (208) 395-0011  
FACSIMILE: (208) 433-0167

**IDAHO FALLS OFFICE**  
477 SHOUP AVENUE  
SUITE 203A  
IDAHO FALLS, ID 83402  
TELEPHONE: (208) 528-6101  
FACSIMILE: (208) 528-6109

**COEUR D'ALENE OFFICE**  
250 NORTHWEST  
BOULEVARD, SUITE 106A  
COEUR D'ALENE, ID 83814  
TELEPHONE: (208) 765-6888

**ALL OFFICES TOLL FREE**  
(877) 232-6101

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

March 18, 2009

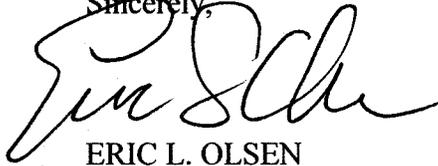
Jean Jewell  
IPUC Commission Secretary  
472 W. Washington  
Boise, Idaho 83702

**Re: IPC-E-08-23**

Dear Mrs. Jewell:

Enclosed for filing you will find the original and seven (7) copies of the Response to Idaho Power's Motion to Close Case.

Sincerely,



ERIC L. OLSEN

ELO/nj  
Enclosures

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2009 MAR 20 PM 2:03  
IDAHO UTILITIES COMMISSION

Eric L. Olsen, ISB No. 4811  
RACINE, OLSON, NYE, BUDGE &  
BAILEY, CHARTERED  
P.O. Box 1391; 201 E. Center  
Pocatello, Idaho 83204-1391  
Telephone: (208) 232-6101  
Fax: (208) 232-6109

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IDAHO PUBLIC  
UTILITIES COMMISSION

*Attorneys for Idaho Irrigation Pumpers Association, Inc.*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER )  
COMPANY'S PETITION FOR APPROVAL OF )  
CHANGES TO THE IRRIGATION PEAK )  
REWARDS PROGRAM. )  
)  
IDAHO POWER COMPANY'S PROPOSAL TO )  
RECOVER THE ANNUAL COST OF THE )  
PROGRAM IN THE PCA. )  
\_\_\_\_\_ )

**CASE NO. IPC-E-08-23**

**RESPONSE TO IDAHO POWER'S  
MOTION TO CLOSE CASE**

COMES NOW the Idaho Irrigation Pumpers Association, Inc. ("Irrigators"), by and through counsel of record, Eric L. Olsen, and in accordance with IDAPA 31.01.01 Rules 57 and 256, hereby timely responds to Idaho Power Company's ("Idaho Power" or "Company") Motion to Close Case filed on the 10<sup>th</sup> day of March 2009.

The Irrigators makes no opposition to Idaho Power's Motion to Close Case provided that the Idaho Public Utilities Commission ("Commission") rule on the Irrigators' Application for Intervenor Funding ("Application") which was filed on December 12, 2008. As indicated in the Application, the Irrigators' President, Vice President, Executive Director, Board Member, attorney, and consultant, all fully participated in the meetings and conference calls that resulted in the Stipulation referenced by Idaho Power in its Motion. On January 14, 2009, the Commission issued Final Order No. 30716 approving the Stipulation's suggested changes to the Irrigation Peak Rewards Program.

The Irrigators' participation addressed issues of concern to the general body of 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. With the approval of the changes to the Peak Rewards Program additional summer load should be shaved during the summer of 2009 and subsequent years.

The expenses that the Irrigators incurred as a result of its participation continue to constitute a financial hardship. The Irrigators are an Idaho nonprofit corporation representing electric utility rate matters affecting farmers in southern and central Idaho. The Irrigators rely solely upon dues and voluntary contributions paid by members, together with intervenor funding, to support activities.

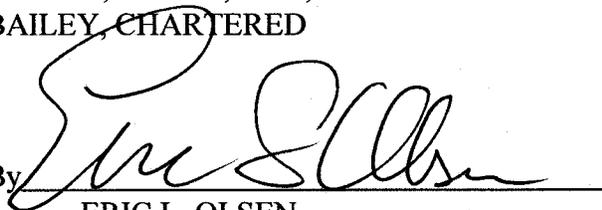
Pursuant to Idaho Code § 61-617A and IDAPA 31.01.01.161 through .165 and as more fully established in the Application, the Irrigators believe that they should be entitled to an award of costs of intervention in an amount as determined by the Commission.

Again, the Irrigators do not oppose Idaho Power's Motion to Close Case so long as the Commission rules on the Irrigators' Application.

DATED this the 18<sup>th</sup> day of March, 2009.

RACINE, OLSON, NYE, BUDGE &  
BAILEY, CHARTERED

By



ERIC L. OLSEN

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18<sup>th</sup> day of March, 2009, I served a true, correct and complete copy of the Idaho Irrigation Pumpers Association, Inc.'s Response to Idaho Power's Motion To Close Case 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 & Email

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 & Email

Weldon Stutzman  
Neil Price  
Deputy Attorney Generals  
Idaho Public Utilities Commission  
472 W. Washington (83702)  
P.O. Box 83720  
Boise, ID 83720-0074  
E-mail: [weldon.stutzman@puc.idaho.gov](mailto:weldon.stutzman@puc.idaho.gov)  
E-mail: [neil.price@puc.idaho.gov](mailto:neil.price@puc.idaho.gov)

U.S. Mail/Postage prepaid & Email



ERIC L. OLSEN