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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF) **CASE NO. IPC-E-11-19**
IDAHO POWER COMPANY FOR AUTHORITY)
TO CONVERT SCHEDULE 54 – FIXED COST) **APPLICATION FOR**
ADJUSTMENT – FROM A PILOT SCHEDULE) **INTERVENOR FUNDING FOR**
TO AN ONGOING PERMANENT SCHEDULE) **NW ENERGY COALITION**

The NW Energy Coalition (“Coalition”), pursuant to Idaho Code § 61-617A and IDAPA 31.01.01.161–165 submits the following application for intervenor funding. On November 29, 2011 in Order No 32402, the Commission granted the Coalition’s request for intervention.

I. Idaho Code § 61-617A and IDAPA Rule 31.01.01.161 Requirement

Idaho Power Corporation, is a regulated public utility with gross Idaho intrastate, annual revenues exceeding three million, five hundred thousand dollars (\$3,500,000.00).

II. IDAPA Rule 31.01.01.162 Requirements

1. Itemized list of Expenses

The attached Exhibit A is an itemized list of expenses incurred by the NW Energy Coalition in this proceeding.

2. Statement of Proposed Findings

The Coalition asks this Commission to approve Idaho Power’s application to make the Fixed Cost Adjustment (FCA) mechanism permanent largely in its current form. Also, the Coalition asks the Commission to grant this request for intervenor funding to support the Coalition’s efforts in reviewing the case, participating in the settlement negotiations and reply comments.

3. Statement Showing Costs

This application is to support the Coalition’s efforts in reviewing the case, participating in the

settlement negotiations, and filing reply comments. The Coalition's Policy Director, Nancy Hirsh, reviewed the initial Idaho Power filing and testimony, traveled to Boise from Seattle to participate in the settlement discussions on January 27, reviewed production requests and initial comments from all the parties before filing reply comments on March 15.

The Coalition requests \$700.85 in intervenor funding, as shown in Exhibit A, for expert analysis time and travel costs. Both the hours expended and costs incurred are reasonable for this complex case.

4. Explanation of Cost Statement

The NW Energy Coalition is a nonprofit organization supported solely through grants from charitable foundations and membership dues. The Coalition has eleven member organization's based and working in Idaho. In this proceeding, the Coalition represents the interests of these member groups in promoting energy efficiency throughout the Idaho Power service territory. The Coalition's Policy Director is based in our Seattle, WA office.

5. Statement of Difference

The reply comments filed in this case demonstrate that the Coalition's proposed recommendation is different than the proposed finding of Commission Staff. The Coalition's reply comments raised concerns about the approach recommended by Staff as undermining the fundamental intent of the FCA mechanism. While Staff represented their modification as a modest adjustment to the FCA mechanism, the Coalition detailed why this "modest" change would in fact reduce recovery of fixed costs and maintain the incentive to sell more kWh.

The Coalition's reply comments supported the comments filed by the Idaho Conservation League and the public comments submitted by the Snake River Alliance in that they found that the FCA mechanism should be made permanent as it is currently structured.

6. Statement of Recommendation

The Fixed Cost Adjustment (FCA) addresses a very specific problem – recovery of fixed costs is linked to sale of electricity, encouraging increased use and discouraging investments in energy

efficiency or any other program (like distributed generation) that reduces electricity throughput. By calculating the per-customer revenues needed to cover specific fixed costs, the FCA removes the disincentive for demand-side investments that help customers use less electricity. The FCA also helps ensure the Company's timely recovery of the fixed system costs regardless of sales volumes.

7. Statement Showing Class of Customer

The Coalition has eleven member organization's based and working in Idaho. In this proceeding, the Coalition represents the interests of these member groups in promoting energy efficiency throughout the Idaho Power service territory.

IN CONCLUSION, the NW Energy Coalition respectfully requests the Commission grant this application.

DATED this 22th day of March 2012.

Respectfully submitted,



Nancy Hirsh

Policy Director, NW Energy Coalition

EXHIBIT A

Costs Associated with Nancy Hirsh, Policy Director, NW Energy Coalition

Seventeen hours at \$31.25 per hour = \$531.25

- Review Idaho Power application and testimony 3 hours
- Review IPC response to Commission Staff Production Request 1 hour
- Meet with parties regarding settlement on January 29 2.5 hours
- Review all party comments filed March 1 4 hours
- Prepare and file Coalition reply comments 5 hours
- Prepare Coalition application for intervenor funding 1.5 hours

Total Hours 17.0

Travel from Seattle to Boise, January 26, 2012 –

Settlement Talks with Commission Staff and all Parties \$169.60

Total request for intervenor funding = \$700.85

CERTIFICATE OF SERVICE

I hereby certify that I have this 22th day of March 2012 served the foregoing APPLICATION FOR INTERVENOR FUNDING FOR THE NW ENERGY COALITION to the following via the method of service noted:

Electronic Mail and Hard Copy:

Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983

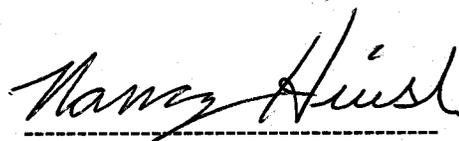
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