

working

Eric L. Olsen ISB# 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
Attorneys for Intervenor
Idaho Irrigation Pumpers Association, Inc.

RECEIVED
FILED

2002 MAY 17 PM 4:55

IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF PACIFICORP, DBA UTAH POWER &)
LIGHT COMPANY FOR APPROVAL OF ITS)
PROPOSED ELECTRIC SERVICE SCHEDULES)
_____)

Case No. PAC-E-02-1

**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 § 61-617JA and IDAPA 31.01.01.162 as follows:

(A) A summary of the expenses that the Irrigators request to recover broken down into legal fees, witness fees and other costs and expenses is set forth in Exhibit "A" attached hereto and incorporated by reference. Itemized statements are also attached to Exhibit "A" in support of this summary.

(B) The Irrigators' proposed findings and recommendations were set forth in the Stipulation and in the Irrigators' closing Comments filed with the Commission in this case in response to the Company's filings and the Commission's notices. The Irrigators' i

*cc: JL
MF
DES
MFUSS
AH
RL*

aligned with all other customer classes in seeking to limit the Company's recovery of its claimed excess power supply costs to only those that were prudently incurred and properly recoverable. Via the Stipulation, the Irrigators supported the Company's net recovery of approximately 22.7 million in excess power supply costs as reasonable and appropriate given (1) the risks of a less favorable result in light of the viability of the defenses further limiting such recover, (2) the Irrigators' limited resources in going through a full contested hearing, and (3) the status settlements reached or in progress in other jurisdictions on this issue. The Irrigators' consultant, Anthony Yankel ("Consultant"), assisted the Irrigators in determining settlement range for Company's claimed excess power supply costs and participated via conference call in one of the settlement conferences.

The rate spread and rate design aspects of this case were of utmost importance to the Irrigators in that the Company proposed, among other things, a potential cost of service increase of up to 19.34% and replacement of the ABC rate schedule and accompanying load control benefits. The Irrigators had to treat the Company's Application prior to any settlement as if it would go to a full contested hearing and had its Consultant review the underlying data and methodology used for the Company's proposed cost of service study. Necessarily, the Irrigators and its Consultant served three Data Requests upon the Company for this purpose and incurred significant time in reviewing the Company's Application to determine its merits. Via the Stipulation, the Irrigators agreed (1) to the revision of the ABC tariff schedule to that of a firm rate and (2) to the use of a Modified Rate Mitigation Adjustment ("RMA") feature that has the effect of making a substantial move for the irrigation class toward perceived cost of service and redistributing the revenues to the benefit of the other customer classes to principally mitigate the effect of Company's excess power supply costs.

The Irrigators' Consultant worked closely with the Irrigators to evaluate the merits of the settlement of this issue and also interacted with the Company and the Commission Staff in the overall settlement process.

(C) The expenses and costs incurred by the Irrigators set forth in Exhibit A attached are reasonable in amount and were necessarily incurred (1) in communicating with representatives of the Company, the Commission Staff, and the Irrigators' governing board, (2) in reviewing and evaluating the Company's Application and exhibits, conducting discovery, negotiating and drafting the Stipulation, and preparing Comments filed on behalf of the Irrigators, and (3) in generally participating in these proceedings before the Commission.

(D) The costs described above constitute a financial hardship for the Irrigators. The Irrigators currently have less than \$14,000 in the bank and substantial accounts payable as a result of participation in this case and several other cases filed recently by Idaho Power and PacifiCorp. 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 and participate in rate cases. Each year a mailing is sent to approximately 7500 Idaho Irrigators (approximately two-thirds in the Idaho Power Company service area and one-third in the Utah Power Company service area), soliciting annual dues. The Irrigators recommend that each member make a voluntary contribution of thirty cents (\$.30) per horsepower for each pumping installation. Member contributions have been falling mainly due to the extremely depressed agricultural economy. 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 small 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 all rate matters affecting its members. As a result of financial constraints, participation in past rate cases has been selective and on a limited basis.

(E) The positions set forth by the Irrigators in these proceedings as set forth in (B) above were different from the positions taken by the Company, Commission Staff and other intervenors with regard to the length and amount of the RMA.

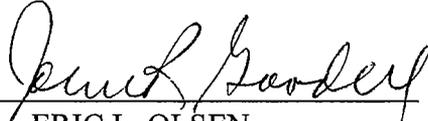
(F) The Irrigators' participation addressed issues of concern to the general body of users or consumers with respect to the negotiation of the amount of excess deferred power costs and the willingness of the irrigation class as a whole to make a substantial move toward the perceived cost of service for said class and the revenue from which was used to mitigate the recovery of the excess power supply costs for all other consumer classes.

(G) The Irrigators represent the irrigation class of customers under Schedule 10.

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 pursuant to Idaho Code § 61-617A and IDAPA 31.01.01.162.

DATED this 17th day of May, 2002.

RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED

By 
for ERIC L. OLSEN

CERTIFICATE OF MAILING

I hereby certify that on the 17th day of May, 2002, a true and correct copy of the foregoing was served on the following via U.S. Mail:

Scott Woodbury, Deputy Attorney General
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

Anthony J. Yankel
29814 Lake Road
Bay Village, OH 44140

Randall C Budge
Racine, Olson, Nye, Budge & Bailey, Chtd.
P.O. Box 1391
Pocatello, ID 83204

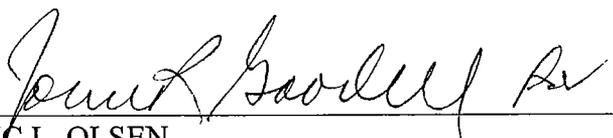
James R. Smith, Senior Accounting Specialist
Monsanto Company
P.O. Box 816
Soda Springs, ID 83276

Tim Shurtz
411 South Main
Firth, ID 83236

Doug Larson
Vice President Regulation
PacifiCorp
201 S. Main, Suite 2300
Salt Lake City, UT 84140

James F. Fell
Erinn Kelley-Siel
John M. Eriksson
Stoel Rives LLP
201 S. Main Street, Suite 1100
Salt Lake City, UT 84110

Conley Ward
Givens Pursley
P.O. Box 2720
Boise, ID 83701


ERIC L. OLSEN

**EXHIBIT A TO APPLICATION FOR INTERVENOR FUNDING
PAC-E-02-1**

LEGAL - ERIC L. OLSEN:

Legal Fees: 117.9 hours @ \$135-\$150 (See Attachment 1 for Detail)	\$16,107.00
--	-------------

Costs: travel, meals, lodging and miscellaneous expenses:	\$1,071.68
--	------------

Total:	<u>\$17,178.68</u>
--------	--------------------

CONSULTING FEES - TONY YANKEL:

Consulting Fees: 152 hours @ \$100 (See Attachment B for Detail)	\$15,200
---	----------

Costs: Travel, meals, lodging, postage, photocopies and miscellaneous expenses:	\$ <u> 0</u>
--	-----------------

Total:	<u>\$15,200.00</u>
--------	--------------------

TOTAL FEES AND EXPENSES:	<u>\$32,378.68</u>
---------------------------------	---------------------------

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Total</u>
01/07/02	Conference regarding PacifiCorp Rate Case and effect on IIPA	0.10	
01/10/02	Receive and review PacifiCorp new 2002 application, testimony and exhibits; prepare file petition to intervene; telephone conference and letter to PUC, letter to D. Larson, J. Erikson requesting service on consultant; telephone conference with D. Larson Re: proposed settlement conference;	1.50	
	Review PacifiCorp new application , testimony, exhibits.	1.00	
01/12/02			
	Prepare file IIPA First Discovery Requests; telephone conference with T. Yankel re: same.	1.00	
01/30/02			
	Review Pumper's First Data Requests to UP&L and see that the same are sent out	0.90	
01/31/02			
	For Current Services Rendered	4.60	673.50
	Total Current Work & Costs	673.50	
	Balance Due		<u>\$673.50</u>

ATTACHMENT 1

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Total</u>
01/07/02	Conference regarding PacifiCorp Rate Case and effect on IIPA	0.10	
01/10/02	Receive and review PacifiCorp new 2002 application, testimony and exhibits; prepare file petition to intervene; telephone conference and letter to PUC, letter to D. Larson, J. Erikson requesting service on consultant; telephone conference with D. Larson Re: proposed settlement conference;	1.50	
	Review PacifiCorp new application , testimony, exhibits.	1.00	
01/12/02	Prepare file IIPA First Discovery Requests; telephone conference with T. Yankel re: same.	1.00	
01/30/02			
01/31/02	Review Pumper's First Data Requests to UP&L and see that the same are sent out	0.90	
	For Current Services Rendered	4.60	673.50
	Total Current Work & Costs	673.50	
	Balance Due		<u>\$673.50</u>

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Total</u>
02/01/02	Telephone conference with R. Lobb, T. Yankel re: case preparation, settlement conference, discovery requests/ strategy.	0.30	
02/05/02	Telephone conference with T. Yankel, L. Tominaga, B. Taylor, staff re: pre-hearing conference and settlement conference issues.	0.40	
02/06/02	Conference re: status of Rate Case and attending or PacifiCorp workshop on restructuring.	0.30	
02/07/02	Lunch re: background on PacifiCorp General Rate Cases; review Second Data Requests; e-mail and call and leave message with Tony Yankel re: same; several telephone conferences with Tony Yankel re: finalizing Second Data Requests.	3.50	
02/08/02	Finalize IIPA Second Data Requests and see that same are served; conference re: upcoming scheduling and settlement conference.	0.90	
02/13/02	Review update letter to IIPA re: current Rate Cases before the PUC.	0.20	
02/15/02	Telephone conference with B. Lively (PacifiCorp) re: issues for 2/19 settlement conference; conference re: upcoming scheduling conference; Telephone conference with Lynn Tominaga re: Utah Power Rate Case and breakfast meeting re: same.	0.50	
02/16/02	Conference re: positions to be taken in scheduling conference in PacifiCorp Rate Case.	0.30	
02/18/02	Receive and review Yankel preliminary analysis of Pacificorp scheduling and settlement conference issues; prepare position and issues for statement for 2/18 PUC scheduling/settlement conferences; telephone conference with B. Lively (PacifiCorp) re: issues for settlement conference.	1.80	
02/19/02	Conference re: PacifiCorp case and issues to be raised in scheduling/settlement conference; travel to Boise; attend PacifiCorp/PUC scheduling and settlement conference travel back to Pocatello.	9.30	
02/20/02	Review Third Data Requests prior to sending out.	0.80	
02/25/02	Finalize Third Data Request and see that same are served; outline draft letter to Board re: current settlement negotiations; review PAC filing materials re: changes to COS design and other elements of the filing	3.10	

02/26/02	Continued review of PAC's filing and testimony of James Zhang; continued drafting of status letter to IIPA Board; telephone conference with Tony Yankel re: status of case and scheduling call in conference; conference re: same.	4.40	
		3.60	
02/27/02	Telephone conference with B. Taylor re: case status and strategy, issues and authority for settlement conference with PacifiCorp and staff; meeting re: case analysis, settlement issues and strategy; prepare draft letter to Board re: same; revise letter to IIPA Board; conference re: same.	3.10	
02/28/02	Finalize Board letter; telephone conference with Mark Michelson re: conference call; call and leave message with Bob Lively at PacifiCorp getting revised numbers; telephone conference with Bob Lively re: getting revised numbers for show impact on larger Irrigators of proposed COS redesign	0.80	
	For Current Services Rendered	29.90	4,096.50
02/19/02	Travel to Boise		321.00
02/28/02	Long Distance Telephone Expense		3.72
02/28/02	Long Distance Telephone Expense		<u>8.77</u>
	Total Costs		333.49
	Total Current Work & Costs		\$4,429.99
	Previous Balance		\$673.50
	Balance Due		<u>\$5,103.49</u>

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Total</u>
03/04/02	Receive and review Pacificorp Schedule 10C Exhibits and evaluation of proposed COS studies, BPA credit, rate mitigation adjustment on rates of irrigators; telephone conference regarding case settlement issues; Multiple telephone conferences with B. Lively/Pacificorp, T. Yankel, IIPA Board regarding settlement issues and negotiations.		
	Review spread sheet from Bob Lively regarding changes to monthly billing comparisons for irrigators	2.50	
	Conference regarding monthly billing comparison numbers; conference with Bob Lively regarding spread sheet showing adjustments to rates; Conference call is IIPA Board regarding same and upcoming settlement conference	0.60	
	Telephone conference with Lively regarding questions about monthly billing comparisons	2.30	
	Review revised monthly billing comparison numbers;	0.30	
03/05/02	Travel to Boise to attend Settlement Conference; Attend Settlement Conference and reach settlement regarding amount of excess power costs to be recovered; Various telephone conferences with Tony Yankel regarding same; Travel back to Pocatello	10.00	
03/08/02	Conference with Tony Yankel on status of settlement conference on Pacificorp case; Telephone conference with Bob Lively regarding changes in interruptability rate this late in the irrigation season; E-mail Tony Yankel regarding Pacificorp's concerns over being unable to implement new firm power rate schedule and idea of keeping the ABC Tariff Rates in place for 2002 irrigation season	0.80	
03/11/02	Telephone conference with Tim Shurtz regarding status of his intervention in the case and intent to raise motion on rate freeze provision in earlier merger case and Pacificorp's ability to file a general rate case	0.20	
03/12/02	Dictate letter to IIPA Board regarding status of settlement negotiations; E-mail Bob Lively regarding monthly billing comparison	0.20	
03/13/02	Review revised monthly billing comparison from Pacificorp	0.70	
03/14/02	Revise letter to IIPA Board regarding status of settlement negotiations	1.10	

03/18/02	Receive and review Pacificorp proposed settlement stipulation, exhibits; Telephone conference with B. Lively regarding analysis of proposed settlement in irrigators rates; Review proposed stipulation and attachments provided by Pacificorp and forward same on to Tony Yankel; Review proposed stipulation; conference regarding revised schedule and telephone conference with Bob Lively regarding same; Telephone conference with Tony and review schedules to stipulation agreement; Review Tony Yankel's settlement numbers; Telephone conference with Bill Taylor regarding conference on meeting; Telephone conference with Mark Michelsen regarding the meeting on the rate spread	4.60
03/19/02	Conference call with B. Taylor, M. Mickelson regarding proposed settlement stipulation and exhibits with Pacificorp; Conference regarding scheduled conference call with IIPA Board members; Conference with IIPA Executive Committee Members regarding status of current negotiations on Pacificorp rate case	1.90
03/20/02	Travel to Boise to attend settlement conference; Attend settlement conference with Pacificorp and staff and revise proposed stipulation; Travel back to Pocatello	7.00
03/21/02	Conference regarding revision of Pacificorp's proposed stipulation; Review the revised stipulation of the proposed settlement; forward e-mails on to Tony Yankel and see that staff's proposed schedules are faxed to Mr. Yankel; Telephone conference with Tony Yankel regarding results of settlement conference and negotiating strategies going forward	1.30
03/22/02	E-mail Dave Taylor regarding conference call with Tony Yankel about COS Study and IIPA's concerns; telephone conference with Dave Taylor and Tony Yankel regarding issue with respect to Irrigator's cost of service study numbers; Telephone conference with Tony Yankel regarding same	0.60
03/23/02	Receive and review staff rate spread exhibits to settlement stipulation; Telephone conference with T. Yankel regarding settlement "spread" issues	0.60
03/25/02	Review revised monthly billing comparison provided by Pacificorp; Forward e-mail on to Tony Yankel for his review; Review staff's proposal for the RMA spread in conjunction with PCS and its effect on Irrigator class; E-mail Pacificorp regarding changes to its monthly billing comparisons for Irrigators in light of staff's new proposal; Conference regarding IIPA position and settlement of the case	0.90

03/26/02	Receive and review T. Yankel analysis of Pacificorp proposed rate spread; Review Tony Yankel's comments regarding size of cost of service increase and arguments to be made against the same; Telephone conference with Tony Yankel regarding review of comments regarding cost of service study; Telephone conference with Mark Michelsen regarding status of rate case and fax information up to him	1.10
03/27/02	Review Pacificorp's proposed stipulation and exhibits; Telephone conference with Mark Michelsen regarding status of negotiations and set time to meet with executive board; Telephone conference with Randy Lobb regarding status of case with Pacificorp and Irrigator's concerns; Review notes from conversation with Randy Lobb	2.20
03/28/02	Participate in Pacificorp-staff No. 3 settlement conference regarding rate spread and proposed settlement stipulation and exhibits; Participate in staff, Pacificorp, and intervenor conference call; Prepared for meeting IIPA Executive Board; Telephone conference with Doug Larson of Pacificorp regarding irrigator's concerns; Conference with Mark Michelsen and Bill Taylor of IIPA and various telephone conferences with Tony Yankel, Bob Lively, Randy Lobb, and various Pacificorp staff regarding rate design issues within the irrigator class	7.90
03/29/02	Conference regarding status IIPA negotiations with Pacificorp; Telephone conference with Mark Michelsen regarding status and decision of the board on terms of stipulation; Telephone conference with Tony Yankel regarding status of negotiations and other means of addressing the issue of hit to large irrigators; Telephone conference with Bob Lively regarding status of irrigators position with respect to proposed stipulated settlement	1.30
	For Current Services Rendered	<u>48.40</u> <u>6,612.00</u>
03/05/02	Travel to Boise	321.00
03/20/02	Airfare to Boise	321.00
03/31/02	Long Distance Telephone Expenses	<u>41.84</u>
	Total Costs	683.84
	Total Current Work & Costs	7,295.84
	Previous Balance	\$5,103.49
	Balance Due	<u>\$12,399.33</u>

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Total</u>
04/01/02	Call and leave message with Randy Lobb regarding IIPA position; E-mail Bob Lively regarding same	0.20	
04/02/02	Review revised stipulation; review revised schedule B amounts; Telephone conference with Randy Lobb regarding requested changes; Re-draft stipulation language	2.30	
04/03/02	Review changes to stipulation from Bob Lively; forward same on to Tony Yankel and review voicemail from Randy Lobb Telephone conference with Randy Lobb regarding proposal of minor reduction in RMA; Telephone conference with Bob Lively regarding same and language defining large irrigator; Telephone Conference with Mark Michelsen regarding status of settlement terms thereof; Telephone conference with Bob Lively regarding approval of current stipulation by IIPA; Telephone conference with Tony Yankel regarding terms of settlement and preparation of request for intervenor funding	0.30 1.20	
04/05/02	Review e-mail from Tony Yankel about inconsistency in schedule 94 and settlement agreement; Review revised stipulation and accompanying schedules; E-mail Bob Lively regarding same and our understanding of the agreement that had been reached; Review revised schedule 94 sent from Bob Lively; Telephone conference with Randy Lobb regarding stipulation	3.40	
04/24/02	Review order regarding stipulation and hearing schedule; Organize file and dictate letter to Board regarding status of case and upcoming hearings	1.30	
04/25/02	Telephone conference with Tony Yankel regarding whether IIPA needs to present testimony or not; Call and leave message with Randy Lobb at PUC regarding hearings; Revise letter to IIPA Board regarding settlement of case and commission hearings; Telephone conference with Randy Lobb regarding status of hearings and issues the commissioners wanted addressed	1.50	
04/26/02	Telephone conference with Bob Lively at Pacificorp regarding status of hearings Conference with staff regarding upcoming hearings on settlement and need to file testimony	0.20 0.20	
04/29/02	E-mail Tony Yankel regarding not providing testimony and getting information for intervenor funding request	0.10	

05/01/02	Telephone conference with Jim Fell of Stoel Rives regarding spreading testimony on the record; Telephone conference with Tim Shurtz regarding request for a continuance	0.60	
	Telephone conference with Mark Michelsen regarding upcoming hearings on stipulation and testifying regarding IIPA's position at Rigby Hearings	0.50	
05/02/02	Review pre-filed testimony of Bob Lively and Randy Lobb in preparation for technical hearing	1.80	
05/03/02	Review Petition to Intervene from Nu-West Industries, Inc.	0.80	
05/06/02	Travel to Rigby, Idaho for initial workshop and public hearing; Attend workshop; Conference with Mark Michelsen IIPA Board Member regarding content of testimony; Attend public hearing; Travel back to Pocatello	5.00	
05/07/02	Travel to Preston to attend technical hearing; Attend technical hearing and participate therein; Travel back to Pocatello	5.50	
05/09/02	Dictate draft of comments for closing technical hearing for consideration of stipulation; Continued drafting of comments of IIPA regarding reasons for supporting proposed stipulation and treatment of Nu-West in alternatives of being a tariff or contract customer and see that same are filed with commission and served on the parties	4.60	
05/16/02	Prepare application for intervenor funding	2.00	
5/17/02	Continued preparation of application for intervenor funding; Telephone conference with Lynn Tominaga regarding same and see that same is filed with commission	3.50	
		35.00	4,725.00
	For Current Services Rendered		
04/30/02			12.35
05/16/02	Long Distance Telephone Expense		<u>42.00</u>
	Mileage to Preston		
			54.35
	Total Costs		4,779.35
	Total Current Work & Costs		\$12,399.33
	Previous Balance		<u>\$17,178.68</u>
	Balance Due		

ATTACHMENT 2

PacifiCorp BPA/COS/Deferred Power Costs

<u>Date</u>	<u>Hours</u>	<u>Description</u>
Nov. 24	1	Review material supplied by legal counsel from meeting to outline PacifiCorp's rate new case.
Jan-02 10	4	Review material from prior UP&L rate cases to determine how net power costs were previously addressed.
11	2	Review treatment of net power costs in last Utah case and compare differences between the two cases.
15	1	Review of Company filing as well as other materials filed by PacifiCorp; conversation with legal counsel regarding direction of case.
23	5	Review cost of service and power cost issues in filing in relationship to other PacifiCorp cases in Utah and Oregon.
24	4	Review testimony of Watters as well as accompanying exhibits; develop interrogatories regarding same.
25	6	Continued review of testimony of Watters and review of testimony of Widmer as well as accompanying exhibits; compare to last filing in Utah; develop interrogatories regarding service.
28	6	Continued review of testimony of Watters and Widmer as well as accompanying exhibits; continued comparison to last filing in Utah and Oregon; continued development of interrogatories regarding same.
29	8	Review testimony of Taylor and the Company's cost of service study; compare to the cost of service study filed in the last case in Utah; develop interrogatories regarding same.
31	7	Continued review of testimony of Taylor and the Company's cost of service study; continued comparison to the cost of service study filed in the last case in Utah; continued development of interrogatories regarding same.
Feb. 7	8	Review cost of service data and develop cost of service study alternatives that are different than PacifiCorp's, focusing on system coincident demand and power supply cost data.

PacifiCorp BPA/COS/Deferred Power Costs

<u>Date</u>	<u>Hours</u>	<u>Description</u>	
8	7	Continued review of cost of service data and development of cost of service study alternatives that are different than PacifiCorp's focusing on non-coincident demand and distribution data.	
12	6	Operate PacifiCorp's cost of service study computer model and determine how it works.	
13	7	Review the basis for allocation factors used in the Company's COS study including the development of coincident peak data and distribution peak data from the Company's load research data.	
14	8	Continued review of the basis for allocation factors used in the Company's COS study including the development of coincident peak data and distribution peak data from the Company's load research data.	
15	7	Continued review of the basis for allocation factors used in the Company's COS study including the development of coincident peak data and distribution peak data; compare to results in Utah and note differences including the use of different times of system coincident peak for the same month.	
16	8	Review Company's filing and develop interrogatories regarding cost of service issues.	
18	5	Continued review of Company's filing and development of interrogatories regarding cost of service issues, noting in particular differences with the filing in the last case.	
25	3	Review COS data to determine problem areas in the model; attempt to develop alternative to these problems.	
27	3	Develop direction for legal counsel regarding settlement; determine how PacifiCorp's Exhibit 17 works with respect to how the various charges are related and discuss with legal counsel.	
Mar.	4	3	Review cost of service and direction for settlement; conference with legal counsel and IIPA Board regarding what needs to be done at settlement.

PacifiCorp BPA/COS/Deferred Power Costs

<u>Date</u>	<u>Hours</u>	<u>Description</u>
5	4	Review various materials supplied by the Company and staff regarding settlement; prepare for and attend settlement conference over the phone.
11	3	Review data responses to Irrigators and Staff regarding cost of service issues and Power Cost issues.
15	8	Review load research data as it relates to changed usage in this case; review basis for energy and revenue values in this case that are significantly higher than anything for irrigators in Idaho in the last 10 years.
16	8	Continued review of load research data; continued review of basis for energy and revenue values in this case that are significantly higher than anything for irrigators in Idaho in the last 10 years; continued formulation of position for settlement.
17	4	Continued review of load research data; continued review of basis for energy and revenue values in this case that are significantly higher than anything for irrigators in Idaho in the last 10 years; continued formulation of a position for settlement.
18	1	Various conversations with legal counsel regarding settlement and review of materials supplied by PacifiCorp regarding settlement.
21	1	Conversations with legal counsel, review latest proposals with respect to settlement for the impact on irrigation and other customers.
22	2	Various conversations with legal counsel, Dave Taylor of the company, and Randy Lobb of the Staff; review new data spreadsheet provided by the Company.
23	1	Conversation with legal counsel; review most recent staff proposed settlement.
25	8	Review material supplied by the company in response to our concerns regarding cost of service; develop a listing of cost of service issues based on what was filed in this case and what the Company has recently filed in Utah for the irrigators; prepare a position for negotiations, conference call with legal counsel and Company.

PacifiCorp BPA/COS/Deferred Power Costs

<u>Date</u>	<u>Hours</u>	<u>Description</u>
27	1	Meeting with Dave Taylor in Salt Lake to discuss various positions in the case and how to settle the case.
29	1	Develop possible compromises based upon conversations with Taylor; conversation with legal counsel and IIPA Board members regarding possible compromise position.
April 1	1	Conversation with legal counsel regarding direction of settlement; review of settlement proposal and possible spread scenarios of COS and RMA.
<hr/>		
Total	152	