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 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) AMENDED ELECTRIC SERVICE SCHEDULE)) 72—IRRIGATION LOAD CONTROL CREDIT) RIDER PROGRAM)	Case No. PAC-E-03-03 IDAHO IRRIGATION PUMPERSASSOCIATION, INC'S SUPPLEMENTAL COMMENTS
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COMES NOW the Idaho Irrigation Pumpers Association, Inc. ("Irrigators"), through undersigned counsel, and hereby respectfully submits its supplemental comments on PacifiCorp's proposed Irrigation Load Control Credit Rider Program.

1. Following the decision meeting on March 10, 2003, representatives from PacifiCorp and the Irrigators have been able to discuss alternative methodologies for determining the curtailment credit for the 2003 irrigations season. Our discussions focused on a methodology that looked at the value of the credit based on the shifting by the irrigators of the curtailed load from super-peak to off-peak hours. Although the discussion was constructive, the parties were unable to agree on a specific methodology.

2. PacifiCorp has proposed a credit based on the difference between the market prices for during super-peak and light-load hours. This credit is then discounted by 70% to account for uncertainties, such as whether the curtailed load will actually shift. The revised monthly credits result in increases of up to 29% over the monthly credits initially proposed.

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3. The Irrigators believe that the appropriate scenario to be used is the one that assumes that the shift in curtailed load will occur from super-peak to off-peak hours. The shoulder or light-load hours are already just too full to have any usage shifted to this time frame. PacifiCorp's use of a 70% discount to us is no more than a simple discounting of the value of the interruption. Some minimal level of discounting may be appropriate if the irrigators were not going to move their usage to a different timeframe. However, due to the irrigators' need to water their crops and thus shift usage (because PacifiCorp has designed the program so the participants will get interrupted), there is a very high confidence level that PacifiCorp will get all of its energy and demand revenues as if there were no interruptions. These revenues would already include the cost of electricity priced at the system average cost. PacifiCorp's methodology also further discounts the interruption credit by assuming that the Irrigator must also pay an additional amount for off-peak or light-load power when the average cost of power, i.e., the \$43.58 per MWh, is built into the rates that will be paid by the irrigators because the usage will shift. As such, it totally does not get around the "lost revenue" issue that was correctly raised by Commission Staff. The Irrigators believe that the most appropriate way to value the interruptibility credit is the methodology proposed by Commission Staff.

4. Notwithstanding, one point that the parties do agree on is the need for a timely load control program for the 2003 irrigation season. Therefore, the Irrigators would propose an alternative to PacifiCorp's proposal. Since we do not have access PacifiCorp's model to plug in what we believe to be the appropriate numbers, we did some simple scaling. Because the kilowatt credits that PacifiCorp proposed reflected a discount, we simply took these credits and divided by 70% in order to come up with a proposed monthly credit, as follows:

June	\$2.20 / kW-mo
July	\$2.94 / KW-mo
Aug.	\$3.21 / kW-mo

Sept. \$1.80 / kW-mo

These values represent an increase in PacifiCorp's credit of approximately 42% across the board.

Further, because we believe the curtailed load will be shifted to off-peak hours, these values still allow the PacifiCorp to collect the full \$43.58 per MWh of revenue for essentially all energy that was interrupted. We believe that the credit should not include both the recovery of the off-peak cost of this shifted energy and the revenue from the shifted energy. The Irrigators' proposal for the 2003 irrigation season allows PacifiCorp to have both.

5. The Irrigators do agree with PacifiCorp's proposal that the credit for interruptibility should be evaluated further after the 2003 irrigation season to determine the extent of load shifting and to finalize a methodology to be used in valuing the same. This should be done early in the fall of 2003 so that the matter can be timely addressed by the Commission Staff, the Irrigators and PacifiCorp.

Respectfully submitted this 13th day of March, 2003.

RACINE, OLSON, NYE, BUDGE &
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By  for
ERIC L. OLSEN
Attorneys for the Idaho Irrigation Pumpers
Association, Inc.

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 13th day of March, 2003, I served a true, correct and complete copy of the Idaho Irrigation Pumpers Association, Inc.'s Supplemental Comments Re: PacifiCorp's Irrigation Load Control Credit Rider to each of the following, via U.S. Mail, e-mail or hand delivery:

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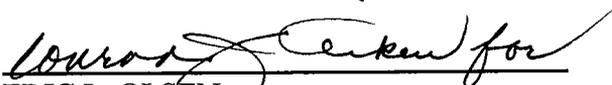
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