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2003 MAY 16 PM 4:54
IDAHO PUBLIC
UTILITIES COMMISSION

ORIGINAL

Attorneys for Plaintiff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

DEL RAY HOLM,

Petitioner,

vs.

UTAH POWER & LIGHT
COMPANY/PACIFICORP,

Respondent.

Case No. PAC-E-03-07

PETITIONER'S REPLY TO
PACIFICORP'S ANSWER AND
MOTION TO DISMISS

COMES NOW Del Ray Holm by and through his attorney, Robert C. Huntley, and presents his reply to PacifiCorp's Answer and Motion to Dismiss as follows:

1. PacifiCorp incorrectly characterizes the Petition as being primarily a "request for itemization of costs"—we do indeed need an itemization of the costs but such is meaningless without PacifiCorp providing the "core of our request" which is for specifications as to the lines and transformers so that a competitive bid can be made and a determination can be made whether PacifiCorp is overcharging.

2. Attached hereto as Appendix A is a bid by Arco Electric Inc. based on its assessment of the proper specifications for the project. The bid comes in at \$47,234 which is approximately \$5,000 BELOW that of PacifiCorp. **The bid is actually approximately \$8,000 BELOW that of PacifiCorp** because the Arco bid contains \$3,000 for secondary conductor which is not included

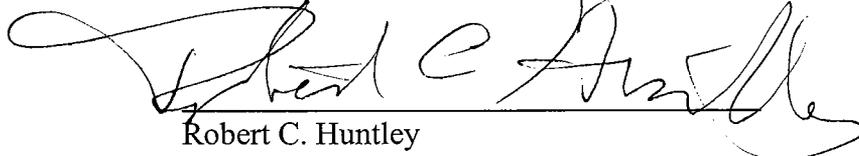
in the PacifiCorp bid.

3. Petitioner respectfully requests:

- (a) The PacifiCorp provide the specifications requested; and
- (b) Regulation 12 be amended as necessary to provide for customer installation of conversions; and
- (c) The Commission adopt such other relief as necessary to insure that PacifiCorp's monopoly not be used in a manner to inflict unfair and unjust and unreasonable charges and rates upon the Idaho consumer.

DATED this 16th day of May, 2003.

HUNTLEY PARK LLP

A handwritten signature in black ink, appearing to read "Robert C. Huntley", is written over a horizontal line. The signature is stylized and cursive.

Robert C. Huntley

CERTIFICATE OF SERVICE

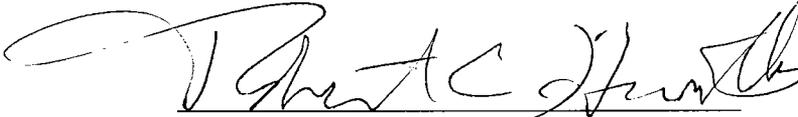
I HEREBY CERTIFY that on the 16th day of May, 2003, a true and correct copy of the foregoing document was served on the below listed individuals by the method indicated below:

Mary S. Hobson
STOEL RIVES
101 South Capitol Blvd., Suite 1900
Boise, ID 83702
Fax: 389-9040

Hand Delivered
 U.S. Mail
 Overnight Mail
 Facsimile

John M. Eriksson
STOEL RIVES
One Utah Center
201 S. Main St. Suite 1100
Salt Lake City, UT 84111
Fax: 801-578-6999

Hand Delivered
 U.S. Mail
 Overnight Mail
 Facsimile


Robert C. Huntley

ARCO ELECTRIC INC

P.O. Box 50429
Idaho Falls, Idaho 83405
208-522-2185 Fax 208-529-3423
E-Mail arco@srv.net

This proposal is valid for 30 days
From 5/15/2003, unless noted
Otherwise.

TO: Del Ray Holm
2725 East 500 North
Roberts, Idaho 83444

PROJECT: Underground Power conversion on two systems. A 450 HP vertical lift pump, with a 150 HP booster pump. The other for a 350 HP vertical lift pump.

We propose to furnish all labor, materials, equipment and applicable taxes necessary to complete the electrical installation on the above project, as shown on the drawings and described in the specifications.

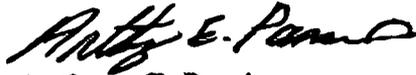
Two Transformer Pads	\$853.00
Meter bases, conduits, fittings	\$5,302.00
Secondary Wire	\$867.00
Place wire in trench	\$2,383.00
Road crossing, conduit and place wire in conduit	\$1,839.00
18,000 feet of #1 260 mill 25KV TRXLP cable	\$18,720.00
2 - each 500 KVA Transformers 14,400 Volts 277/480 Volts	\$10,400.00
Equipment	\$1,685.00
Taxes, permits, overhead and profit	\$5,185.00

Appendix A

TOTAL \$47,234.00

**This BID DOES NOT INCLUDE:
Bond Premium (if required, add \$566.81)
Cost of Utilities for construction purposes**

ARCO ELECTRIC INC.



**Anthony E. Passino
Vice President**

**State License #C3513
Public Works #11698-AAA-4 (14)**

P.O. BOX 50429, 625 WEST 25TH STREET,
IDAHO FALLS, IDAHO 83405
TELEPHONE 1-208-522-2185
FAX 208-529-3423

ARCO ELECTRIC Inc.

May 15, 2003

Mr. Del Ray Holm
2725 East 500 North
Roberts, Idaho 83444

Subject: Underground Power

Dear Del Ray;

After reviewing your work scope to convert from overhead power to underground power, we believe we can save you money over the current proposal from Utah Power and Light. As with their proposal we have figured that you as the owner will provide all trenching and backfill. We will provide the wire, the road crossing, the transformer pad and transformer along with connections to your existing pumps.

- According to our calculations #4 Alum 15kv cable is adequate for the loads in question. Also we are proposing cross-link Polyethylene underground cable.
- UP&L's proposal shows two 500 KVA transformers and pad design. This is ok for the larger installation, however a 300 KVA transformer is adequate for the smaller pump installation.
- We are assuming you will be metering your pump installations at 480 Volt,

I have assumed that some one else will remove the existing overhead line once your underground work is installed. We look forward to this opportunity to work with you on this project.

Sincerely,

Anthony E. Passino
Anthony E. Passino

