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 Community Action Partnership
 Association of Idaho

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 IDAHO PUBLIC
 UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NO. PAC-E-06-04
OF PACIFICORP DBA ROCKY MOUNTAIN)	
ELECTRIC SERVICE SCHEDULES NOS. 10)	
400 AND 401)	COMMUNITY ACTION
)	PARTNERSHIP ASSOCIA-
)	TION OF IDAHO'S
)	PETITION FOR INTER-
)	VENOR FUNDING

COMES NOW, petitioner Community Action Partnership Association of Idaho (CAPAI) and, pursuant to Idaho Code § 61-617A and Rules 161-165 of the Commission's Rules of Procedure, IDAPA 31.01.01, petitions this Commission for an award of intervenor funding.

Rule 162 Requirements

(01) Itemized list of Expenses

Consistent with Rule 162(01) of the Commission's Rules of Procedure, an itemized list of all expenses incurred by CAPAI in this proceeding is attached hereto as Exhibit "A."

(02) Statement of Proposed Findings

PacifiCorp did not propose any changes to its low-income weatherization program in its original filing in this case. Because PacifiCorp had previously agreed to address the issue of whether it should be allowed to limit its investment in any given low-income weatherization project to 50% of total costs in this proceeding, CAPAI and the Company consequently entered into settlement negotiations. On June 19, 2006, CAPAI and PacifiCorp executed a settlement agreement. A true and correct copy of that agreement was attached as an exhibit to CAPAI's written comments filed in this case dated November 3, 2006. The key elements of the agreement include the following:

- 1) PacifiCorp shall make a one-time cash contribution of shareholder money of ten-thousand dollars (\$10,000) to the Southeastern Idaho Community Action Agency ("SEICAA") and the Eastern Idaho Community Action Partnership ("EICAP") to be used as funding assistance for the "Lend-A-Hand" program for the 2006-2007 heating season.
- 2) PacifiCorp agreed to (and did) make a formal filing before the Commission (Case No. PAC-E-06-10) to address the Company's limitation of only funding 50% (a percentage that CAPAI disputes reflects the actual level of funding) of low-income weatherization costs.
- 3) PacifiCorp agreed to provide support for legislation sponsored by CAPAI during the 2007 general Idaho legislative session that would give the Commission authority to approve voluntary, utility-proposed low-income assistance programs, the costs of which would be included in the utilities' cost of service.

4) CAPAI agreed to waive PacifiCorp's commitment to file a general rate case made in Case No. PAC-E-05-1 and makes no objection to the Company's application in the present case seeking rate increases for Monsanto Corp., Nu-West Industries, Inc. and PacifiCorp's irrigation customers.

(03) Statement Showing Costs

Attached hereto as Exhibit "A" is a statement showing the costs incurred by CAPAI in this proceeding. CAPAI submits that the costs and fees incurred are reasonable. Because PacifiCorp filed Case No. PAC-E-06-10 dealing with the 50% issue after this case was filed, but before it was concluded, there is some overlap between costs and fees incurred regarding that single issue between the two cases. The undersigned has only included in this Petition costs incurred regarding the 50% issue prior to September 1, 2006 to avoid any duplication.

Because this case was settled, the costs and fees incurred were naturally much less than those typically incurred in a general rate proceeding. In addition, CAPAI did not retain an expert witness in this case, but relied upon the expertise it has acquired in recent cases and, primarily, on its legal counsel for negotiation and consultation purposes. CAPAI is on an extremely limited budget and, by necessity, must minimize its costs to the greatest extent possible.

(04) Explanation of Cost Statement

CAPAI is a non-profit corporation overseeing a number of agencies who fight the causes and conditions of poverty throughout Idaho. CAPAI's funding for any given effort might come from a different variety of sources, including governmental. Many of those funding sources, however, are unpredictable. Some contain conditions or

limitations on the scope and nature of work eligible for funding. The cost to CAPAI of participating in this proceeding constitutes a significant financial hardship to the organization.

This Commission has been extremely accommodating to CAPAI's regular involvement in significant proceedings such as this, and the Commission has awarded CAPAI its reasonable costs in past rate cases. If it were not for this fact, CAPAI would simply not be able to afford to participate and advance the interests of not only low-income ratepayers, but all ratepayers. In spite of the Commission's honorable decisions, there is never a guarantee that CAPAI will recover the costs it incurs in these proceedings. Furthermore, even if the Commission does ultimately award full recovery through intervenor funding, CAPAI must pay its costs as it goes. This constitutes a significant challenge, in terms of cash-flow, for non-profits organizations, such as CAPAI, who operate on unpredictable and limited budgets.

No other intervenor in this proceeding represented, exclusively, the interests of the residential class, particularly the low-income sector of that class. CAPAI raised issues, and represented the interests of, the general body of PacifiCorp's ratepayers. For example, the low-income weatherization program for which CAPAI seeks increased funding reduces the consumption of electricity during PacifiCorp's summer peak season helping to defer the acquisition of marginally-priced resources and provides other system-wide benefits including the reduction of bad debt and arrearages.

(05) Statement of Difference

Staff did not take a position or participate in the settlement executed by CAPAI in this case, nor did any other party. Thus, it is fair to say that where CAPAI takes specific

positions on issues that Staff does not address in detail, there are significant differences between CAPAI and Staff for purposes of intervenor funding requests.

(06) Statement of Recommendation

CAPAI's participation in this case addressed issues of concern to the general body of ratepayers. The problems facing PacifiCorp's low-income customers are societal problems that affect us all. Those problems, if not addressed, adversely affect all utility ratepayers in the form of increased collection and associated costs as well as the write-off of uncollectible accounts. These are costs that are passed on to all ratepayers. If low-income customers are enabled to lower their electric bills through a Company-funded weatherization program, this decreases the likelihood that they will be unable to pay their bills and, consequently, the Company avoids incurring the aforementioned costs.

Furthermore, because the low-income weatherization program is a DSM program, it represents a resource to the Company. It is in the best interests of PacifiCorp's ratepayers for the Company to have a healthy diversity of resources. By promoting the conservation of electricity consumption, the Company is able to defer the acquisition of new, marginally higher cost, resources.

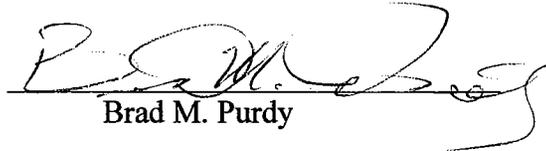
In addition, the \$20,000.00 of assistance funded to the Lend-A-Hand program will help to avoid certain customers from becoming delinquent and/or being terminated as customers. This saves the Company, and all ratepayers, various tangible costs.

Consequently, though a hearing was never conducted, CAPAI's participation in this case contributed materially toward shaping the scope, and focus of the issues and evidence presented to the Commission and, thus, the ultimate outcome of this proceeding, by offering a perspective not offered by any other party.

(07) Statement Showing Class of Customer

To the extent that CAPAI represented a specific PacifiCorp customer class, it is the residential class.

RESPECTFULLY SUBMITTED, this 1st day of December, 2006.


Brad M. Purdy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 1st day of December 2006, I caused to be served the foregoing PETITION OF COMMUNITY ACTION PARTNERSHIP ASSOCIATION OF IDAHO FOR INTERVENOR FUNDING on the following, by first class mail, postage prepaid.

Brian Dickman
PacifiCorp
201 S. Main St., Suite 2200
Salt Lake City, UT 84111

Scott Woodbury
Deputy Attorney General
Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702

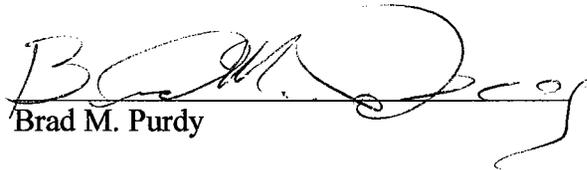

Brad M. Purdy

EXHIBIT "A"
ITEMIZED EXPENSES

Costs:		
Photocopies		\$15.00
Total Costs		\$15.00
Fees:		
Legal	(Brad M. Purdy 7.6 hours @ \$120.00/hr)	\$912.00
Total Fees		\$927.00
Total Expenses		\$927.00