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LOUIS F. RACINE (1917-2005)  
WILLIAM D. OLSON, OF COUNSEL

November 19, 2007

Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 W. Washington Street  
Boise, Idaho 83702

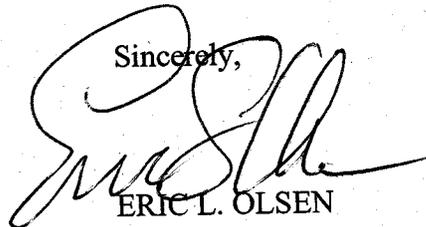
Re: PAC-E-07-05

Dear Mrs. Jewel:

Enclosed for filing please find the original and seven copies of Idaho Irrigation Pumper's Association's Application for Intervenor Funding..

Thank you for your assistance.

Sincerely,



ERIC L. OLSEN

ELO:kb

Enclosures

cc: Service List (via e-mail & U.S. mail)

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2007 NOV 20 AM 10:11  
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RECEIVED

2007 NOV 20 AM 10:11

IDAHO PUBLIC UTILITIES COMMISSION

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Attorneys for Intervenor  
Idaho Irrigation Pumpers Association, Inc.

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION OF )  
ROCKY MOUNTAIN POWER FOR APPROVAL ) **CASE NO. PAC-E-07-05**  
OF CHANCES TO ITS ELECTRIC SERVICE )  
SCHEDULES )  
\_\_\_\_\_ )

**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 § 61-617A and IDAPA 31.01.01.161 through .165, in Rocky Mountain Power's ("RMP") general rate case, as follows:

(A) A summary of the expenses that the Irrigators request to recover broken down into legal fees, consultant fees and other costs and expenses is set forth in Exhibit "A" attached hereto and incorporated by reference. Itemized statements are also included as Attachments 1 and 2 to Exhibit "A" in support of said summary and are incorporated by reference.

(B) The Irrigators' President, Mark Mickelsen, board member, Stan Searle, legal counsel, Eric L. Olsen, and consultant, Anthony J. Yankel, P.E., fully participated in these proceedings.

Procedurally, this case went forward like a full blown rate case with direct and rebuttal testimony being filed. This case also had greater significance to the Irrigators given the devastating loss of the BPA Credit in May of this year.

The Irrigators' President, Mark Mickelsen, urged the Commission that the loss of the BPA credit and RMP's proposed rate increase will cause serious rate shock to the irrigation class going forward. Mr. Mickelsen further urged that one tool that the Irrigators have to help mitigate the loss of the BPA Credit and RMP's pending rate increase is to participate in RMP's load control programs. Mr. Mickelsen urged that the Commission must increase the credit paid to the Irrigators who participate in the load control programs.

Irrigators board member, Stan Searle, testified that he did not participate in RMP's load control programs in 2007 due to his determination that the credit RMP gave to participants of the programs did not outweigh the risks of covering his sunk planting costs and the possibility of losing yields and crop quality if sufficient water was not applied to his crops. Mr. Searle testified that he would participate in the load control programs in the future if the credit for participation in these programs is large enough to outweigh the risks of participation.

The Irrigators' consultant, Anthony Yankel, urged Commission that because of the situs treatment of the load control credit given to Irrigators, the revenue requirement for Residential and all other Idaho customers was unjustifiably increased, the more Irrigators join in the load control programs. He recommended that the Commission treat the irrigation load control programs as system benefit resources, and not as its present situs cost allocation. Mr. Yankel urged the Commission that RMP's load research data does not fully reflect the level of Irrigation load curtailment, and thus, RMP's cost of service study attributes too much demand to the Irrigators and

thus, increases the costs allocated to the irrigation class. Mr. Yankel recommended that the Commission adjust the Company's coincident peak data for the Irrigators in order to reflect the actual level of load curtailment that is taking place and thereby increase the rate of return for the Irrigators and therefore further recommending that the Irrigators get no more than 2/3 of the average jurisdictional percentage rate increase. Mr. Yankel further urged the Commission that the present load control credit for Irrigation customers is considerably below the benefit provided to the system. He recommended to the Commission that the load control credit be increased by \$40/kW-year, in order to bring more Irrigators into the program, benefit the entire system at a cost less than avoided cost, and to provide an overall benefit to the system that is greater than what is presently being realized. Mr. Yankel further urged the Commission to establish time-of-day rates for the Irrigators as an additional option that could both benefit the system and the customers that choose that rate.

After continuing to prepare for the technical hearings, RMP and the Irrigators reached an agreement for the settlement of this case late in the evening of November 4, 2007. This was the result of active participation of Mr. Mickelsen, Mr. Searle and other Irrigators board members, Mr. Olsen, and Mr. Yankel. Key elements of the Irrigators' positions that were put forth before the Commission were included in the stipulation, principally the equal percentage rate increase for the irrigation class and the participation based increase in the dispatchable load control credit. The Irrigators were present at the technical hearing before the commission on November 6, 2007, and urged the Commission to adopted the settlement that had been reached between all parties.

(C) The expenses and costs incurred by the Irrigators set forth in Exhibit A and accompanying attachments are reasonable in amount and were necessarily incurred. The expenses and costs were incurred in reviewing the Company's filing and intervenor testimony, preparing and

reviewing approximately 84 Irrigators' data requests and responses, drafting and filing direct testimony, drafting sur rebuttal testimony, preparing summary testimony and attending public hearings, drafting cross-examination questions for the Company and intervenor witnesses, and participating in the settlement discussions that resulted in the settlement stipulation that was presented to the Commission.

(D) The costs described in Paragraph (A) above constitute a financial hardship for the Irrigators. The Irrigators currently have approximately \$16,000.00 in the bank. Accounts payable for legal and consultant fees and costs in this case total \$66,027.12 as set out in Exhibit "A" and accompanying attachments, none of which have been paid.

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 mailings are sent to approximately 7500 Idaho Irrigators (approximately two-thirds in the Idaho Power Company service area and one-third in the RMP service area), soliciting annual dues. The Irrigators recommend members make voluntary contributions based on acres irrigated or horsepower per pump. Member contributions have been falling which are believed to be attributable to the depressed agricultural economy and increased operating costs and threats, particularly those relating to water right protection issues.

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 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 and in this case has been selective and, primarily, on a limited basis. The Irrigators also have been concurrently participating in the Idaho Power Company general rate case, which is adding additional financial strain on the organization.

(E) The Irrigators' positions urged to be adopted by the Commission materially differed from those addressed by the Commission Staff and other parties on several important points. First, the principal tool the Irrigators have to help control their energy costs is voluntary participation in RMP's load control programs. The Irrigators provided direct testimony that the load control credit amounts must be increased to encourage greater participation, to help the Irrigators have a viable option to use in mitigating the loss of the BPA Credit, and to bring the credit in line with the benefit received by RMP and the whole Pacifcorp system. In the Stipulation, RMP has promised to provide the Irrigators and Commission Staff with the methodology to value the credit in the future. The Commission Staff did not address these load control issues that the Irrigators had raised. Secondly, the Irrigators urged the adoption of an irrigation time-of-use rate. The Irrigators believe that this type of voluntary program could also help reduce Idaho's peak electricity use like the load control programs currently in place. The Commission Staff did not address this issue.

(F) The Irrigators' participation addressed issues of concern to the general body of users or consumers on RMP's and Pacificorp's system. The irrigation load control programs have enabled RMP to shave approximately 50 to 75 mwh of load during the summer system peak in 2006 and

2007. This reduction in peak load benefits all Idaho customer classes by reducing the overall system costs allocated to Idaho. This translates into lower rate increases when rate cases are filed. Continuation and expansion of the irrigation load control programs may also defer the building of additional generation plant as indicated in PacifiCorp's 2007 Integrated Resource Plan. Avoiding these type of costs is also a benefit to all of RMP's Idaho tariff customers.

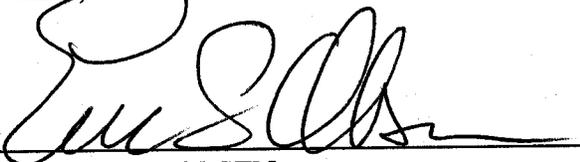
(G) The Irrigators represent the irrigation class of customers under Schedule 10.

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 in the maximum amount allowable pursuant to Idaho Code § 61-617A and IDAPA 31.01.01.161 through .165.

DATED this 19<sup>th</sup> day of November, 2007.

RACINE, OLSON, NYE, BUDGE &  
BAILEY, CHARTERED

By



ERIC L. OLSEN

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of November, 2007, I served a true, correct and complete copy of the Idaho Irrigation Pumpers Association, Inc.'s Application for Intervenor Funding to each of the following, via U.S. Mail or private courier, e-mail or hand delivery, as indicated below:

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Idaho Public Utilities Commission  
472 W. Washington Street  
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Boise, Idaho 83720-0074  
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UPS Next Day Letter

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ERIC L. OLSEN

**EXHIBIT A**

**SUMMARY OF EXPENSES INCURRED BY IRRIGATORS**  
**IN CASE NO. PAC-E-07-05**

1. Legal Fees:

Eric L. Olsen (Partner):	120.5 hrs @ \$175.00	\$21,087.50
Dave Bagley (Associate):	1.6 hours @ \$145.00	\$ 232.00
Sally Beitia (Paralegal):	6.8 hours @ \$75.00	\$ 510.00

Costs:

Tele. Conf./Long distance:	\$ 218.84
Postage:	\$ 71.02
Travel/Mileage	<u>\$ 282.76</u>

Total Work and Costs: \$22,402.12

2. Consultant Anthony J. Yankel:

349 hrs @ \$125 per hour \$43,625.00

Expenses:

Travel, room and meals \$ 0.00

Total Work and Costs: \$43,625.00

**TOTAL FEES AND EXPENSES:**

**\$66,027.12**

# **Attachment 1**

RACINE OLSON NYE BUDGE & BAILEY, CHARTERED  
IDAHO IRRIGATION PUMPERS ASSOCIATION

Date	Atty	Rate	Hours	Amount	Description
6/1/2007	ELO	175	0.3	52.5	TELEPHONE CONFERENCE WITH MARK MICKELSON RE: AFFECT OF BPA CREDIT LOSS AND ISSUES IN R RATE CASE
6/11/2007	ELO	175	0.4	70	CONFERENCE WITH LYNN TOMINAGA RE: RMP RATE CASE
6/12/2007	ELO	175	0.1	17.5	CALL AND LEAVE MESSAGE WITH TONY YANKEL
6/13/2007	ELO	175	0.5	87.5	TELEPHONE CONFERENCE WITH TONY YANKEL RE: RMP CASE FILING AND STRATEGY RE: SAME; CALL BRIAN DICKMAN RE: GETTING ELECTRONIC COPY OF FILING
6/18/2007	ELO	175	0.2	35	TELEPHONE CONFERENCE WITH TONY YANKEL RE: ISSUES IN RMP RATE CASE
6/19/2007	ELO	175	0.7	122.5	REVIEW EMAIL FROM TONY YANKEL; EMAIL BRIAN DICKMAN RE: GETTING E-COPY OF FILING; TELEPHO CONFERENCE WITH TONY YANKEL RE: GETTING RMP'S FILLING IN SUPPORT OF 2006 STIPULATION; REVIE FILES AND DICTATE LETTER RE: SAME; EMAIL TONY YANKEL 2005 DATA REQUEST FILES
6/21/2007	ELO	175	0.5	87.5	CONFERENCE WITH RANDY LOBB RE: RMP RATE CASE ISSUES
6/22/2007	ELO	175	0.6	105	TELEPHONE CONFERENCE WITH TONY YANKEL RE: SUBMISSION OF DATA REQUESTS AND REVIEW THE SAME; REVIEW MONSANTO LETTER RE: ANALYSIS OF INTERRUPTIBILITY
6/25/2007	ELO	175	0.3	52.5	PREPARE PETITION FOR INTERVENTION
7/1/2007	ELO	175	0.2	35	SEE THAT PETITION TO INTERVENE IS PREPARED
7/2/2007	DB	145	0.4	58	REVIEW AND REVISE PETITION TO INTERVENE (IDAH POWER); SEE THAT PETITION IS FILED
7/12/2007	ELO	175	0.3	52.5	REVIEW MESSAGE FROM SCOTT WOODBURY RE: SCHEDULING; EMAIL HIM RE: SAME
7/19/2007	DB	145	1.2	174	REVISE FIRST DATA REQUEST AND SEE THAT SAME I FILED AND SERVED TO APPROPRIATE PARTIES
7/23/2007	ELO	175	0.6	105	REVIEW RMP DISCOVERY RESPONSES TO MONSANTO'S DATA REQUESTS; CONTINUED REVIEW OF RMP FILING
7/27/2007	ELO	175	0.1	17.5	EMAIL FIRST DATA REQUESTS TO PACIFICORP DATA REQUEST RESPONSE CENTER
7/30/2007	ELO	175	0.2	35	TELEPHONE CONFERENCE WITH TIM SCHURTZ TACT TO TAKE IN RMP RATE CASE
7/30/2007	ELO	175	0.1	17.5	CONFERENCE WITH SB RE: STATUS OF DATA REQUESTS; ORGANIZING FILE RE: SAME
7/30/2007	ELO	175	0.5	87.5	TELEPHONE CONFERENCE WITH TONY YANKEL RE: ADDITIONAL INTERROGATORIES; SEE THAT THIRD SE OF DATA REQUESTS ARE SENT OUT
7/31/2007	ELO	175	0.4	70	REVIEW RMP PROTECTIVE AGREEMENT; EXECUTE EXHIBIT A; EMAIL SAME TO RMP
8/2/2007	ELO	175	0.8	140	TELEPHONE CONFERENCE WITH MARK MICKELSON RE: RMP RATE CASE; TELEPHONE CONFERENCE WITH TONY YANKEL RE: RMP RATE CASE ISSUES
8/3/2007	ELO	175	1.6	280	REVIEW PACIFICORP DSM REPORT
8/6/2007	ELO	175	0.4	70	TELEPHONE CONFERENCE WITH TONY YANKEL

PACIFICORP DSM REPORT AND FINDINGS RE:  
IRRIGATION INTERRUPTIBILITY PROGRAM

Date	Type	Hours	Rate	Description
8/8/2007	ELO	175	0.5	87.5 REVIEW DATA REQUESTS AND SEE THAT SAME ARE SENT OUT
8/8/2007	SAB	75	0.5	37.5 DRAFT FOURTH DATA REQUEST
8/10/2007	ELO	175	0.1	17.5 TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: WITNESS FOR LAY TESTIMONY IN RMP CASE
8/10/2007	ELO	175	0.4	70 REVIEW RMP SCHEDULING ORDER AND CALENDAR SAME
8/13/2007	SAB	75	0.5	37.5 FINALIZE AND TRANSMIT FOURTH DATA REQUEST
8/14/2007	ELO	175	1.2	210 TELEPHONE CONFERENCE WITH TONY YANKEL RE: RMP DISCOVERY OBJECTION AND OTHER ISSUES IN CASE; REVIEW COMMISSION RULES AND IRCP RE: SCOPE OF DISCOVERY; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: RATE CASE ISSUES; TELEPHONE CONFERENCE WITH TONY YANKEL RE: 4TH DATA REQUESTS AND PRICING OF CREDIT; REVIEW VOICE MAIL OF BRIAN DICKMAN; CALL AND LEAVE MESSAGE; EMAIL TONY YANKEL RE: SAME
8/15/2007	ELO	175	0.3	52.5 REVIEW YANKEL'S COMMENTS RE: DSM REPORT AND CREDIT PRICING AND FORWARD ON TO MARK MICKELSEN; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: SAME
8/16/2007	ELO	175	0.3	52.5 REVIEW FIFTH DATA REQUEST AND SEE THAT SAME I FILED AND SERVED
8/17/2007	ELO	175	0.5	87.5 TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: MEETING WITH RMP AND STRATEGY ON RATE CASE
8/17/2007	ELO	175	0.3	52.5 FINALIZE FIFTH DATA REQUESTS AND SEE THAT SAM ARE SERVED
8/22/2007	ELO	175	0.4	70 TELEPHONE CONFERENCE WITH TONY YANKEL RE: ISSUES IN RMP RATE CASE
8/23/2007	ELO	175	0.3	52.5 ANALYZE ISSUES WITH RMP DATA REQUEST
8/24/2007	ELO	175	0.4	70 TELEPHONE CONFERENCE WITH TONY YANKEL RE: ISSUES ON RUNNING GRID MODEL; TELEPHONE CONFERENCE WITH BRIAN DICKMAN RE: GETTING COMPUTER TO RUN GRID MODEL AND RUNNING RAM MODEL; EMAIL TONY YANKEL RE: SAME
8/28/2007	ELO	175	0.1	17.5 TELEPHONE CONFERENCE WITH TONY YANKEL RE: FINAL DISCOVERY FOR RMP RATE CASE
8/30/2007	ELO	175	0.5	87.5 TELEPHONE CONFERENCE WITH TONY YANKEL RE: STATUS OF RMP DATA REQUESTS; CONFERENCE WITH RCB RE: MONSANTO'S POSITION IN INTERRUPTABILIT PRICING; REVIEW DATA REQUESTS AND SEE THAT SA ARE ARE SERVED
9/5/2007	ELO	175	0.9	157.5 TELEPHONE CONFERENCE WITH TONY YANKEL RE: ISSUES WITH RMP DATA RESPONSES; CALL AND LEAV MESSAGE WITH JEFF LARSEN RE: SAME; SEE THAT CONFERENCE CALL IS SET UP TO DISCUSS RATE CASE; TELEPHONE CONFERENCE WITH MESSRS. BELL AND BROWN AND TONY YANKEL RE: QUESTIONS ON DATA PROVIDED FOR IIPA DATA REQUESTS
9/6/2007	ELO	175	0.1	17.5 TELEPHONE CONFERENCE WITH BART KLINE RE: QUESTIONS ON THIRD DATA REQUEST

9/10/2007 ELO	175	0.3	52.5 TELEPHONE CONFERENCE WITH TONY YANKEL RE: RMP RATE CASE TESTIMONY
9/11/2007 ELO	175	0.5	87.5 CONFERENCE WITH RCB RE: MONSANTO'S POSITION ON PRICING OF INTERRUPTIBILITY; TELEPHONE CONFERENCE WITH TONY YANKEL RE: SAME
9/17/2007 ELO	175	1	175 TELEPHONE CONFERENCE WITH STAN SEARLE RE: IIPA MEETING AND PROVIDING TESTIMONY; CONFERENCE WITH SB RE: FINDING CONTACT INFORMATION FOR MATT LOGOMARSINO; REVIEW; TELEPHONE CONFERENCE WITH ANN LOGOMARSINO RE: RMP RATE CASE AND GIVING TESTIMONY RE: SA
9/17/2007 ELO	175	2	350 CONTINUED REVIEW OF RMP RATE CASE FILING
9/17/2007 SAB	75	0.4	30 SEARCH FOR CONTACT INFORMATION FOR HOWE, AREA FARMER LOGOMARSINO OR SIMILAR NAME
9/18/2007 ELO	175	1	175 TELEPHONE CONFERENCE WITH STAFF RE: ISSUES WITH RMP CASE FILING; TELEPHONE CONFERENCE WITH TONY YANKEL RE: SAME
9/19/2007 ELO	175	1.6	280 REVIEW FILE IN PREPARATION FOR PREPARING HEARING TESTIMONY; TELEPHONE CONFERENCE WITH MATT LOGOMARSINO RE: AFFECT OF LOSS OF BPA CREDIT ON OPERATIONS AND PROVIDING TESTIMONY
9/20/2007 ELO	175	3.8	665 PREPARE FOR IIPA MEETING ON RATE CASES; CONFERENCE WITH STAN SEARLE RE: TESTIMONY FOR RMP RATE CASE; ATTEND IIPA CONFERENCE CAL ON RATE CASE
9/21/2007 ELO	175	2.2	385 TELEPHONE CONFERENCE WITH TONY YANKEL RE: RMP TESTIMONY; DRAFT TESTIMONY OF MARK MICKELSEN; REVIEW YANKEL DRAFT TESTIMONY
9/24/2007 ELO	175	0.2	35 TELEPHONE CONFERENCE WITH TONY YANKEL DIRECT TESTIMONY
9/25/2007 ELO	175	5.4	945 CONTINUED DRAFTING AND REVISING OF TESTIMONY FOR STAN SEARLE AND MATT LOGOMARSINO; FINISH DRAFTING SEARLE DIRECT AND EMAIL SAME; TELEPHONE CONFERENCE WITH STAN SEARLE RE: SAME; EMAIL TOMINAGA AND MICKELSEN RE: PUBLIC HEARINGS AND STRATEGY RE: SAME
9/25/2007 ELO	175	2.1	367.5 REVIEW DRAFT YANKEL'S DIRECT TESTIMONY; TELEPHONE CONFERENCE WITH TONY YANKEL RE: SAME
9/26/2007 ELO	175	0.2	35 TELEPHONE CONFERENCE WITH MS. LAGOMARSINO RE: REVIEW OF TESTIMONY
9/26/2007 ELO	175	3	525 DRAFT DIRECT TESTIMONY OF MICKELSEN; TELEPHONE CONFERENCE WITH MS. MICKELSEN RE: SAME
9/26/2007 ELO	175	2.1	367.5 PREPARE TESTIMONY EXHIBITS; TELEPHONE CONFERENCE WITH TONY YANKEL RE: SAME
9/26/2007 ELO	175	0.5	87.5 TELEPHONE CONFERENCE WITH STAN SEARLE RE: FINALIZING TESTIMONY
9/27/2007 ELO	175	3.1	542.5 REVIEW YANKEL FINAL DIRECT TESTIMONY; TELEPHONE CONFERENCE WITH TONY RE: EXHIBITS; TELEPHONE CONFERENCE WITH MRS. LARGOMARSINO RE: DECLINING TO PROVIDE TESTIMONY; FINALIZE SEARLE AND MICKELSEN

9/28/2007 SAB	75	1.1	82.5 TESTIMONY; FINALIZE YANKEL TESTIMONY AND EXHIBITS; CONFERENCE WITH SAB RE: SERVING SAM ELECTRONIC TRANSMISSION OF DIRECT TESTIMONY AND EXHIBITS; TELEPHONE CONFERENCE WITH JEAN JEWELL; AMENDED NOTICE OF SERVICE
10/1/2007 ELO	175	1.2	210 REVIEW TESTIMONY OF SHURTZ AND AGRIMUM'S EXPERT; CONTINUED REVIEW OF RMP'S INITIAL FIL TESTIMONY
10/1/2007 ELO	175	0.1	17.5 CONFERENCE WITH SB RE: GETTING ELECTRONIC DISK OF TESTIMONY TO COMMISSION
10/5/2007 ELO	175	1.5	262.5 REVIEW APPLICATION OF PRO HAC VICE FOR RMP LEGAL COUNSEL; REVIEW PACIFICORP'S 2007 IRP I PREPARATION FOR HEARINGS
10/8/2007 ELO	175	0.3	52.5 TELEPHONE CONFERENCE WITH LYNN AND BRENDA TOMINAGA RE: UPCOMING PUBLIC HEARINGS AND GETTING MEMBERS TO SAME
10/8/2007 ELO	175	1.2	210 CONTINUED REVIEW OF PACIFICORP 2007 IRP
10/9/2007 ELO	175	0.5	87.5 REVIEW RMP DISCOVERY REQUESTS AND EMAIL YANKEL RE: SAME
10/16/2007 ELO	175	0.3	52.5 TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: UPCOMING MEETING WITH ROCKY MOUNTAIN POWER
10/17/2007 ELO	175	1.8	315 TELEPHONE CONFERENCE WITH RANDY LOBB RE: RMP RATE CASE; TELEPHONE CONFERENCE WITH TONY YANKEL RE: SAME; REVIEW STAFF TESTIMONY
10/18/2007 ELO	175	3	525 PREPARE FOR RMP MEETING; CONFERENCE WITH RMP REPRESENTATIVES AND IIPA BOARD MEMBERS RE: SETTLEMENT OPTIONS
10/18/2007 ELO	175	3.9	682.5 CONTINUED REVIEW OF STAFF TESTIMONY; CONTINUED REVIEW OF RMP TESTIMONY IN PREPARATION FOR HEARING
10/19/2007 ELO	175	2.7	472.5 CONTINUED REVIEW OF STAFF AND AGRIMUM TESTIMONY; REVIEW RMP TESTIMONY IN PREPARATION FOR HEARING; TELEPHONE CONFERENCE MARK MICKELSEN RE: RMP SETTLEMENT DISCUSSIONS; REVIEW LETTERS TO EDITOR AND READER LETTERS
10/22/2007 SAB	75	1.9	142.5 RESEARCH REGIONAL NEWSPAPERS AND MEMORANDUM TO ELO WITH INFORMATION ON DEADLINES, ETC FOR OP-ED PIECES; LISTING OF NEWSPAPERS OF GENERAL CIRCULATION
10/22/2007 ELO	175	2.9	507.5 TELEPHONE CONFERENCE WITH TONY YANKEL RE: DISCOVERY RESPONSES AND REBUTTAL TESTIMONY; CONTINUED REVIEW OF AGRIMUM'S TESTIMONY; TELEPHONE CONFERENCE WITH SCOTT WOODBURY RE: PROCEDURE FOR HEARINGS; FINALIZE DISCOVER RESPONSES; TELEPHONE CONFERENCE WITH TONY YANKEL RE: POSSIBLE REBUTTAL TESTIMONY; TELEPHONE CONFERENCE WITH STAN SEARLE RE: TESTIMONY; FINALIZE IIPA'S DISCOVERY RESPONSE TO RMP
10/23/2007 SAB	75	1.4	105 GATHER INFORMATION RE: PUBLICATION OF OP-ED PIECES/REQUIREMENTS/DEADLINES
10/24/2007 SAB	75	1	75 MEMORANDUM TO ELO WITH COMPREHENSIVE

Date	ELO	Hours	Rate	Description
				INFORMATION RE: NEWSPAPERS OF GENERAL CIRCULATION IN SNAKE RIVER BASIN; SOUTHEAST IDAHO AND REQUIREMENTS AND DEADLINES FOR OPINION PIECES
10/25/2007	ELO	175	2.6	455 REVIEW MONSANTO'S DISCOVERY RESPONSES; TELEPHONE CONFERENCE WITH STEPHANIE MICKELSEN RE: LETTERS TO EDITOR AS SEE THAT SAME ARE FAXED FOR REVIEW; REVIEW RMP'S REBUTTAL TESTIMONY
10/26/2007	ELO	175	1.2	210 CONTINUED REVIEW OF RMP REBUTTAL TESTIMONY; TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: GETTING PR OPINION LETTERS PUBLISHED
10/26/2007	ELO	175	0.2	35 TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: LETTERS; TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: SAME; CALL AND LEAVE MESSAGE WIT JOE DANIELS ABOUT RMP HEARINGS IN GRACE
10/29/2007	ELO	175	4.4	770 RESPOND TO PROCEDURAL MEETING E-MAIL FOR STATUS CONFERENCE; CONTINUE REVIEW OF COMPANY REBUTTAL TESTIMONY IN PREPARATION FOR HEARING; TELEPHONE CONFERENCE WITH TONY YANKEL RE: PREPARING SUR REBUTTAL TESTIMONY; CONTINUED REVIEW OF COMPANY REBUTTAL AND DIRECT TESTIMONY IN PREPARATION FOR HEARING
10/30/2007	ELO	175	4.5	787.5 PREPARE FOR RATE CASE; TELEPHONE CONFERENCE WITH STAN SEARLE RE: SCHEDULING TESTIMONY AND ATTENDANCE AT PUBLIC HEARINGS; PREPARE IIPA TESTIMONY SUMMARY FOR PUBLIC HEARINGS; TELEPHONE CONFERENCE WITH TONY YANKEL RE: RMP SETTLEMENT NEGOTIATIONS POSITIONS; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: RIGBY HEARING; CONFERENCE WITH LYNN TOMINAGA RE: SUMMARY OF TESTIMONY AND ATTENDING RIGBY HEARING
10/31/2007	ELO	175	1	175 TELEPHONE CONFERENCE WITH MARK MICKELSON RE: RESULTS OF PUBLIC HEARINGS AND RMP GETTIN METHODOLOGY FOR CREDIT AMOUNT; REVIEW RMP SETTLEMENT OFFER; REVIEW SUR REBUTTAL TESTIMONY OF TONY YANKEL
11/1/2007	ELO	175	4.7	822.5 REVIEW RMP SETTLEMENT WORKSHEET; REVIEW LOAD CONTROL TARIFFS; TELEPHONE CONFERENCE WITH YANKEL RE: SAME; DRAFT COUNTER-PROPOSAL; ARRANGE AND PARTICIPATE IN CONFERENCE CALL WITH IIPA EXECUTIVE COMMITTEE RE: RMP SETTLEMENT OFFER; REVISE COUNTER-PROPOSAL; TELEPHONE CONFERENCE WITH MARK MOENCH AND JEFF LARSEN RE: SAME; CONFERENCE CALL WITH MARK MICKELSEN AND RMP RE: COUNTEROFFER; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: SAME
11/1/2007	ELO	175	2.5	437.5 TRAVEL ONE WAY TO GRACE FOR HEARING; ATTEND RMP RATE CASE PUBLIC HEARINGS IN GRACE
11/2/2007	ELO	175	5.4	945 REVIEW RMP AND STAFF WITNESSES FOR CROSS EXAMINATION; MULTIPLE TELEPHONE CONFERENCES

				WITH TONY YANKEL RE: SAME; PARTICIPATE IN STA SCHEDULING CONFERENCE FOR RATE CASE; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: RMP COUNTEROFFER; MULTIPLE CONFERENCE CALLS WITH TONY YANKEL AND MARK MICKELSEN RE: COUNTEROFFER; PARTICIPATE IN MULTIPLE CONFERENCE CALLS WITH MARK MOENCH AND JEFF LARSEN
11/3/2007 ELO	175	8.7	1,522.50	CONTINUED REVIEW OF RMP DIRECT AND REBUTTAL TESTIMONY; EMAIL AND TELEPHONE CONFERENCES WITH JUSTIN BROWN RE: WITNESSES FOR CROSS EXAMINATION AND PRESENTATION OF LIVE SUR REBUTTAL TESTIMONY OF MICKELSEN AND YANKEL; MULTIPLE TELEPHONE CONFERENCES WITH TONY YANKEL RE: WITNESSES AND ISSUES TO RAISE CROSS EXAMINATION; REVIEW 2007 IRP AND 2007 DSM REPORT; DRAFT CROSS EXAMINATION; TELEPHONE CONFERENCE WITH MARK MICKELSEN RE: POSSIBLE COUNTEROFFERS; TELEPHONE CONFERENCE WITH RANDY LOBB RE: STAFF POSITION ON LOAD CONTROL CREDIT
11/4/2007 ELO	175	9.5	1,662.50	CONTINUED DRAFTING OF CROSS EXAMINATION RMP WITNESSES; CONFERENCE CALL WITH TONY YANKEL AND MARK MICKELSEN RE: TESTIFYING AT HEARING AND SETTLEMENT COUNTEROFFER; DRAFT COUNTEROFFER FOR SETTLEMENT; TELEPHONE CONFERENCE WITH JUSTIN BROWN AND EMAIL SAME; REVIEW AND COMMENT ON YANKEL SUR REBUTTAL TESTIMONY; MULTIPLE TELEPHONE CONFERENCES WITH YANKEL RE: CROSS AND REBUTTAL QUESTIONS; MULTIPLE TELEPHONE CONFERENCE WITH MARK MICKELSEN AND JEFF LARSEN RE: SETTLEMENT NEGOTIATIONS AND SETTLE CASE; REVIEW REVISED SETTLEMENT TERMS SHEET AND EMAIL JEFF LARSEN RE: SAME
11/5/2007 ELO	175	2.1	367.5	REVIEW AND REVISE STIPULATION; TELEPHONE CONFERENCE WITH JUSTIN BROWN RE: SAME; REVIEW SUBSEQUENT DRAFTS OF SETTLEMENT STIPULATION AND SIGN AND EMAIL SIGNATURE PAGE; PREPARE FO HEARING
11/6/2007 ELO	175	3	525	TRAVEL TO BOISE (ONE WAY) FOR RATE CASE HEARING
11/6/2007 ELO	175	1.8	315	ATTEND PUC HEARING AND SUPPORT APPLICATION OF STIPULATION FOR SETTLEMENT OF RATE CASE
11/19/2007 ELO	175	5.4	945	PREPARE APPLICATION FOR INTERVENOR FUNDING
	Billable	128.9	21,829.50	

IDAHO IRRIGATION PUMPERS ASSOCIATION, INC.  
PACIFICORP/RMP 2007 GENERAL RATE CASE

Cost Transaction File List  
RACINE OLSON NYE BUDGE & BAILEY, CHARTERED  
IDAHO IRRIGATION PUMPERS ASSOCIATION

Trans		
Date	Atty	Amount
6/29/2007	ELO	19.72 POSTAGE
6/29/2007	ELO	2.5 POSTAGE
6/29/2007	ELO	24.4 POSTAGE
10/17/2007	ELO	84.88 TELECONFERENCE CHARGES
10/17/2007	ELO	33.63 TELECONFERENCE CHARGES
11/1/2007	ELO	95.33 TELECONFERENCE CHARGES
11/19/2007	ELO	24.4 POSTAGE
11/15/2007	ELO	226.98 RT MILEAGE POCATELLO-BOISE
11/15/2007	ELO	<u>55.78 RT MILEAGE POCATELLO-GRACE</u>
	TOTAL	<u><u>567.62</u></u>

IDAHO IRRIGATION PUMPERS ASSOCIATION, INC.  
PACIFICORP/RMP 2007 GENERAL RATE CASE

# **Attachment 2**

<u>Date</u>	<u>Hours</u>	<u>Description</u>
June 1	1	Review various material filed by UP&L regarding commitments; request copies of the 2007 IRP.
12	4	Review historical FERC Form 1 data in order to develop relationships between historic usages of various customer classes and a manner similar to that presented in IPCo.
15	5	Review cost of service study results, allocators, and changes in allocation factors and billing determinants from previous case.
18	4	Read portions of the filing and testimony of Walje; review how Walje testimony fits with where the irrigation load is and how the Idaho load has developed.
19	4	Review testimony of McDougal and begin to develop interrogatories.
21	3	Review testimony of Widmer; review his listing of costs and cost changes; compare changes in costs with historical records from other data
22	6	Review testimony of Tucker and Griffith as well as associated exhibits; do calculations in order to check exhibits; develop and finalize final set of interrogatories.
July 2	7	Review testimony of Walje and develop interrogatories regarding distribution plant in Idaho; Review McDougal testimony and develop interrogatories regarding system wide new plant, the BPA credit and
3	4	Review McDougal testimony and develop interrogatories regarding Irrigation Load Control, and DSM; review testimony of Widmer and develop questions regarding net power costs.
16	7	Break out June and July data for Irrigation load research for 2003 so as to develop an individual profile of usage for Irrigators for the whole summer; use these profiles to review the ability to develop time-of-use rates for the irrigation class.
18	8	Break out August and September data for Irrigation load research for 2003 so as to develop an individual profile of usage for Irrigators for the whole summer; use these profiles to review the ability to develop time-of-use rates for the irrigation class.
19	7	Aggregate load research data for 2003 and substitute Monday loads for Sundays and visa versa; determine impact of change of usage when incorporating time of day rates.
20	8	Aggregate load research data for 2003 and substitute Thursday and Friday loads for Saturday and Sundays and visa versa; determine impact of change of usage when incorporating time of day rates.

<u>Date</u>	<u>Hours</u>	<u>Description</u>
23	7	Aggregate load research data for 2003 and substitute largest use loads for Saturday and Sundays and visa versa; determine impact of change of usage when incorporating time of day rates.
24	8	Review data responses to for Monsanto; review impact of load growth on Residential, Commercial, and Irrigation customers; develop interrogatories dealing with time of use.
26	3	Review data responseses to Staff Request 1 and data responses to Monsanto Request 2.
27	3	Review responses to Staff data requests as well as responses to requests made by Monsanto.
30	8	Develop interrogatories related to Net Power Cost; the basis of the load that goes into the Net Power Cost model; and the establishment of a number of scenarios regarding shifting in time of use and the resulting impact upon system costs and Idaho jurisdictional costs; develop 4th set
31	4	Review the Company's responses to Monsanto's 2nd set of interrogatories and review the various attachments that support these responses.
Aug 2	4	Review different impacts of rates under existing Schedules 1 and 36 with Schedule 10 and 72 in order to determine relative impacts of time of day rates on the various irrigation rate schedules.
6	7	Read the Company's recent report written by Quantec regarding an assessment of long-term system-wide potential for demand side and other supplemental resources. Review appendices as well.
7	7	Read the Company's recent report written by Quantec regarding an assessment of long-term system-wide potential for demand side and other supplemental resources. Review appendices as well. Develop interrogatories.
15	7	Review load research data from 2003 to develop patterns of usage for different sided (strata) irrigators in order to review the possibility of time of day rates being an effective way to shift load.
20	3	Review load research data from 2003 to develop patterns of usage for different sided (strata) irrigators in order to review the possibility of time of day rates being an effective way to shift load.
22	2	Review responses to Irrigator's first data set; look for problems with the responses and develop additional data requests as needed.

<u>Date</u>	<u>Hours</u>	<u>Description</u>
23	8	Review data responses to Irrigator's first data request; develop a means of extracting compressed files that were in Text and get them into Access format; work unsuccessfully to extrat data from some file that were sent that could not be extracted; request the data files that were too large to be broken down by year, instead of three years together.
24	8	Review data responses to Agrium and Monsanto; review data responses to Irrigators; look into Revised Protocol and the basis for treating Monsanto differently on a jurisdictional basis than the Irrigators that are curtailed.
27	8	Review background regarding the Revised Protocol method including the testimony of Taylor and other witnesses for the Company in Case No. PAC-E-02-3; review exhibits filed on February 28, 2005 regarding how the Revised Protocol worked; review differences between the treatment of special contract customers and DSM.
28	6	Review data responses to Irrigator requests and those of others: review data given regarding maximum prices paid for purchase power between data given to Irrigators response 1.11 and Monsanto response 2.50 and try to discer why the data for the same hours should be different.
29	8	Put together computer and components for GRID: review 300 pages of manuals regarding the operation of the GRID program; conversations with PacifiCorp employee regarding the running of the GRID model.
30	8	Review Irrigation load research data in order to see how different sized customers used energy differently from each other during 2006; observe and ask questions regarding why some Irrigation samples were missing, and what was done with the missing data; begin to summarize data into categories like average usage by hour and average usage by day of the
31		Review Irrigation load research data in order to see how different sized customers used energy differently from each other during 2006; begin to summarize data into categories like average usage by hour and average usage by day of the week; work with Laren Hale of PacifiCorp in order to learn how to run the GRID model.
Sept 4	7	Work with Laren Hale of PacifiCorp in order to run GRID model; analize various runs and continue to work with Hale in order to correct problem.
5	7	Analize proposed modeling of 25 MW of irrigation curtailment in GRID in order to assess what was wrong with the results; review individual load research data for irrigators in order to determine impact on results of the customers that are under Schedule 72; review the impact of individual residential load research data and attempt to follow how these number flow through to the cost of service study.
6	1	Work with Scott Thornton of PacifiCorp regarding load research data problems.

<u>Date</u>	<u>Hours</u>	<u>Description</u>
7	2	Review emails from PacifiCorp regarding data problems in the load research data; change data and review impacts; conversations with load research personel; conversations with company regarding additional discovery responses that were not able to be opened; conversation with Hale regarding GRID problem.
8	4	Review GRID output for possible flaws in the model; review data responses to the Staff regarding weather normalization and compare how weather normalization occurs between Sch. 1, Sch. 36, and Sch. 23.
10	6	Work with PacifiCorp Hale in order to run GRID in order to understand the underlying reasons for the counterintuitive results of shifting on-peak load; review various outputs of the GRID model including hourly sales and purchases under the original model run and under the assumption of shifting some on-peak load to off-peak.
11	7	Review data responses; review hourly data from GRID model to assess the appropriateness of the model to reflect what is transpiring on the system and how the GRID model reacts to changes in load such as result for the irrigation load management program.
12	4	Review data regarding hourly usage of the most expensive purchases on the system in order to develop a means of assessing this data on an hourly basis as well as the same day of the week basis in order to understand the patterns involved in the costs.
13	8	Outline testimony issues regarding the overall revenue requirement give the GRID model; inaquities in the Revised Protocol; lack of representation of the irrigation load management program in the cost of service study; and the need to better price irrigation load management and to develop a time of use rate for irrigators.
14	7	Writing testimony regarding the impact of the BPA credit loss and the off-setting impacts of possible DSM options.
15	4	Writing testimony regarding the impact of the BPA credit loss and the off-setting impacts of possible DSM options.
17	8	Develop load and cost data for Irrigation Load Curtailment program recommedation; calculate a balance between the level of the credit and the amount of benefit to be provided to the system.
18	8	Write testimony regarding pssoble time-of day rates for Irrigators; develop Irrigation load research data so as to be combined to reflect the average hour usage of the average Irrigation customer on any given day of the week for purposes of pricing.

<u>Date</u>	<u>Hours</u>	<u>Description</u>
19	7	Write testimony regarding possible time-of day rates for Irrigators; develop Irrigation load research data so as to be combined to reflect the average hour usage of the average Irrigation customer on any given day of the week for purposes of pricing' write summary for Irrigators review for upcoming conference call with the Board in order to go over proposals.
20	8	Review data regarding Irrigation curtailment program and time-of-day rates; continue to develop numbers that reflect possible scenarios for rates for TOD; conference call with Irrigators regarding direction for rate
21	7	Review new data responses to Irrigators and Monsanto; review impact of Revised Protocol on Idaho and develop testimony regarding same; look into problems with GRID model; coordinate with Iverson regarding GRID and other issues.
24	8	Review and continue to develop testimony regarding the load research data and its impacts upon the Company's cost of service study; develop exhibits that show the lack of representation in the irrigation demand data of the load curtailment customers; develop allocation recommendation, given the Company's position and the changed data provided by the
25	8	Develop alternative approach to calculating the credit for the irrigation load curtailment program; review historic cost and participation information regarding the irrigation load curtailment program.
26	8	Reread testimony; develop testimony that reflected the recent DSM Report put out by the Company; make changes to insure that testimony was internally consistent.
27	6	Review final testimony; correct wording errors; compile exhibit 305; conversations with Olsen.
18	3	Settlement conference call with PacifiCorp; follow-up conversation with Olsen; review of testimony of the Staff in the case.
19	3	Review testimony of Staff; review of testimony of other witnesses in case; review Company's proposed settlement offer regarding credit to the Irrigators and ways to price it.
22	5	Review Iverson testimony for Monsanto; review data regarding number and times of Monsanto interruptions and compare with time of year, day of week and time of day; develop list of hours of highest usage on the system and compare with times of Monsanto interruptions.
23	4	Review testimony of Peseau; develop position regarding how the credits to Monsanto can be translated into the irrigation credit; conversations with Olsen regarding both issues.
26	4	Review rebuttal testimony of Company

	<u>Date</u>	<u>Hours</u>	<u>Description</u>
	29	4	Review rebuttal testimony of Company; talk to Iverson regarding similar positions regarding interruptibility credits.
	30	1	Conversations with Olsen regarding settlement talks as well as direction of our rebuttal to the Company.
	31	4	Review Company rebuttal; develop data to support the \$51 based upon new information; draft rebuttal.
Nov	1	4	Multiple conversations with Irrigators, Olsen, and PacifiCorp regarding settlement; develop data and memo to support our positions.
	2	3	Multiple conversations with Irrigators, Olsen, and PacifiCorp regarding settlement.
	3	6	Develop crossexamination positions for various witnesses; develop crossexamination questions for specific witnesses; do extensive review of the Company's 2007 IRP as well as the DSM study that was published.
	4	6	Finalize rebuttal testimony; conversations with Irrigators; review settlement offers; organize materials to take to Boise.

Total 349

@ \$125/hour

\$43,625