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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF PACIFICORP DBA ROCKY MOUNTAIN) CASE NO. PAC-E-08-07
POWER FOR APPROVAL OF CHANGES TO)
ITS ELECTRIC SERVICE SCHEDULES) COMMUNITY ACTION
) PARTNERSHIP ASSOC-
) IATION OF IDAHO'S
) APPLICATION FOR INTER-
) VENDOR FUNDING

COMES NOW, Applicant 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 in the above-captioned proceeding.

Rule 161 Requirements

Rocky Mountain Power is a regulated, electric public utility with gross Idaho intrastate, annual revenues exceeding three million, five hundred thousand dollars (\$3,500,000.00).

(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

The proposed findings and recommendations of CAPAI are set forth in the direct, prefiled testimony of Teri Ottens and interwoven throughout the settlement stipulation to which CAPAI was a signatory. In summary, CAPAI initially proposes that the Commission consider the dire state of poverty in which a significant percentage of Rocky Mountain's customers live and the effect that any rate increase will have on these already overly burdened customers.

Second, CAPAI proposes that Rocky Mountain Power adopt tiered rates. Presently, Rocky Mountain does not have tiered rates. This Commission recently ordered Idaho Power Company to redesign its tiered rates from a two-tiered rate to a year around, three-tiered rate. (Case No. IPC-E-08-10). As a result of CAPAI's efforts made during negotiation, Rocky Mountain Power agreed to include in its next general rate case filing, which the Company states will be in the not-too-distant future, a proposal for, and/or analysis of the appropriateness of tiered rates for the Company.

Third, CAPAI proposes that the Company fund an energy conservation education program specifically targeted to low-income customers such as that recently adopted by AVISTA Corporation (Case No. AVU-E-08-01). CAPAI proposes that Rocky Mountain fund \$25,000 for each Community Action Agency. The two CAP agencies currently providing low-income service within Rocky Mountain's Service Territory include SEICA and EACAP. Rather than simply divide the total funding of \$50,000 equally between the two CAP agencies, the parties agreed to work collaboratively to allocate an allocation of funding including considerations such as how many Rocky Mountain Power customers receiving assistance reside in each of the respective CAP's service area. CAPAI has agreed to provide certain information

regarding how the low-income education program will work no later than May 1, 2009 so that a fair, just and reasonable allocation formula can be devised.

This program would fund personnel and materials to Community Action Agencies to provide conservation education to all Rocky Mountain customers who apply for LIHEAP funding. Thus, it would result in a productive face-to-face explanation of how customers of extremely limited means can reduce their energy consumption. Customers seeking LIHEAP assistance often do not have the ability to implement energy conservation measures or alter their habits to reduce their consumption due to their dire financial condition. Indeed, customers who do not have the money to pay their utility bills might not even open the bill itself and will never see the traditional informational “stuffers” currently provided by Rocky Mountain. Thus, low-income conservation education, as proposed by CAPAI, presents yet another cost effective resource opportunity for the Company.

(03) Statement Showing Costs

CAPAI submits that the costs and fees incurred in this case, and set forth in Exhibit “A,” are reasonable in amount, particularly in light of the fact that the Company’s application in this matter was fully litigated, and that there were roughly 34 witnesses, with exhibits, four days of technical hearing, and nine parties who actively participated in the technical portion of this proceeding.

Although Ms. Teri Ottens undoubtedly qualifies as an expert in the field of energy issues, as they affect low-income customers, CAPAI is not seeking reimbursement for Ms. Ottens’ work, or that of any other representative or agent of CAPAI. CAPAI has historically made a concerted effort to minimize its expenses and maximize the effect that its efforts have in

proceedings before this Commission. Thus, CAPAI submits that the time expended and expenses incurred in this case were reasonable.

(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 and impose conditions or limitations on the scope and nature of work eligible for funding. CAPAI, therefore, has relatively little "discretionary" funds available and what little exists must cover a variety of competing projects, including, as one example, participation in Case No. GNR-U-08-01 (Commission-initiated Energy Affordability Case) for which intervenor funding is unavailable. CAPAI has incurred considerable expense participating in this very important proceeding. There are numerous other examples of projects worthy of CAPAI's involvement but for which funding is unavailable.

Thus, were it not for the availability of intervenor funds and past awards by this Commission, CAPAI would not be able to participate in cases before this Commission leaving a gap not likely to be filled by any other entity. Even with intervenor funding, participation in Commission cases constitutes a significant financial hardship because CAPAI must pay its expenses as they are incurred, not if and when intervenor funding becomes available.

(05) Statement of Difference

Although Staff provided valuable input regarding the energy burden that low income customers carry, CAPAI's specific proposed findings and recommendations in this case differ from those of Staff. Specifically, Staff did not propose funding a low-income conservation education program.

06) Statement of Recommendation

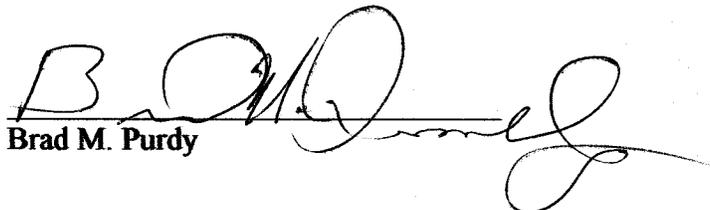
CAPAI has long submitted that providing assistance to a utility's low-income customers provides system-wide benefits and, therefore, the proposals and recommendations made by CAPAI are "of concern to the general body of utility users or consumers." Programs such as the low-income education awareness provide an example of how a relatively nominal investment by the utility can result in reduced electric consumption during peak periods, thereby providing system-wide benefits.

Implementing tiered rates also provide system benefits due to the fact that tiered rates provide an incentive to reduce consumption, particularly when a customer is near threshold between tiers.

(07) Statement Showing Class of Customer

To the extent that CAPAI represents a specific Rocky Mountain Power customer class, it is the residential class.

RESPECTFULLY SUBMITTED, this 26th day of March, 2009.


Brad M. Purdy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 26th day of March, 2009, I caused to be served on the individuals listed below, the foregoing document via electronic transmission and U.S. Postage.

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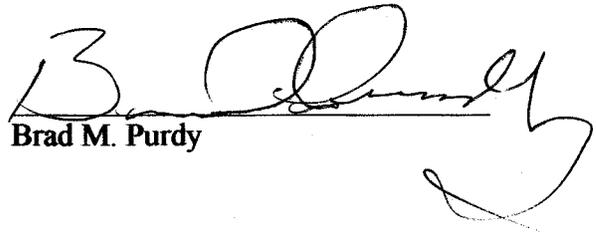
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Brad M. Purdy

EXHIBIT "A"
ITEMIZED EXPENSES

| | | |
|---------------|---|-------------------|
| Costs: | | |
| | Photocopies/postage | \$120.00 |
| | Total Costs | \$120.00 |
| Fees: | | |
| | Legal (Brad M. Purdy –33.70 hours @ \$130.00/hr.) | \$4,230.00 |
| | Total Fees | \$4,380.00 |
| | Total Expenses | \$4,500.00 |