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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for Petitioner
Community Action Partnership
Association of Idaho

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF PACIFICORP DBA ROCKY MOUNTAIN) CASE NO. PAC-E-10-07
POWER FOR APPROVAL OF CHANGES TO)
ITS ELECTRIC SERVICE SCHEDULES) COMMUNITY ACTION
) PARTNERSHIP ASSOCIA-
) TION'S PETITION FOR
) INTERVENOR 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 (Rocky Mountain) is a regulated electric public utility with gross Idaho intrastate annual revenues exceeding three million, five hundred thousand dollars (\$3,500,000.00).

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." CAPAI seeks total funding of \$16,975.75.

(02) Statement of Proposed Findings

The proposed findings and recommendations of CAPAI are set forth in the direct, prefiled testimony of Teri Ottens filed in this matter. CAPAI proposes that Rocky Mountain's LIWA funding be increased to an amount more at parity with AVISTA and that said increase not be deferred pending the outcome of an evaluation of LIWA; a program that the Company already concedes is prudent and cost-effective.

CAPAI further proposes that Rocky Mountain's LIWA program design to eliminate the existing requirement that funding for each LIWA project consist of at least 25% federal funding.

CAPAI opposes Rocky Mountain's proposal to increase its basic monthly charge to \$12.00.

CAPAI proposes an increase in the first consumption block of the Company's proposed tiered residential rate design to 875 kWh.

(03) Statement Showing Costs

CAPAI fully participated in every aspect of this case from its review of the Company's original filing to a post-hearing brief filed contemporaneously herewith. CAPAI addressed issues of concern to the general body of ratepayers, took a position materially different from the Commission Staff, and was the only party who addressed the interests of the Company's sizeable population of low-income customers. Based on this as well as other reasons stated herein, CAPAI submits, therefore, that the costs and fees incurred in this case, and set forth in Exhibit "A," are reasonable in amount.

(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. CAPAI does not have "memberships" and, therefore, does not receive member contributions of any kind. Many of CAPAI's funding sources 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 for all projects. Some matters before this Commission, furthermore, do not qualify for intervenor funding by virtue of their nature.

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. 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.

Because CAPAI's petitions for funding are for monies already expended, and given the length of time between the filing of Rocky Mountain's general rate case, and the conclusion of this proceeding next year and what hopefully will be an award of intervenor funding, CAPAI must carry these expenses for a considerable period of time. This presents significant cash flow challenges. Out of necessity, CAPAI must resourcefully maximize every opportunity at its disposal and make an earnest effort to minimize costs while still competently and meaningfully contributing materially to the Commission's decision in proceedings such as this. Because CAPAI typically cannot afford to retain expert witnesses in all areas that are of concern to low-income customers, it must be resourceful in utilizing the experience of its attorney and low-

income expert and rely on resources and tools readily available to the public. CAPAI and its representatives certainly make their best effort to provide the Commission with information and perspectives that are informed, accurate and, therefore, of use to the Commission in reaching its decisions. It is safe to say that CAPAI's attorney and low-income expert do not simply price their services at otherwise applicable market rates, but take into consideration the financial means of their client as a major factor. CAPAI respectfully submits that this results in intervenor funding petitions that are relatively modest under the circumstances. Were it not for the availability of intervenor funding, it is unlikely that CAPAI would be financially able to continue representing an important and otherwise unrepresented segment of public utility customers.

(05) Statement of Difference

Although Staff provided valuable input regarding most every issue to this matter, CAPAI is the only party who proposed an increase to low-income weatherization funding and program design changes, raised issues regarding the Company's tiered residential rate design, and proposed that Rocky Mountain's proposed basic monthly charge be rejected.

(06) Statement of Recommendation

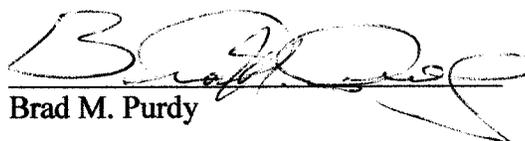
CAPAI addressed issues that are not exclusively related to low-income customers, for example, tiered residential rates, basic monthly charge, etc. Furthermore, it was undisputed that LIWA is a prudent, cost-effective demand side resource for which demand exceeds supply. It is in the best interests of all ratepayers to exploit any such resource options. Furthermore, CAPAI has long submitted that providing assistance to a utility's low-income customers provides system-wide benefits in numerous respects including, but not limited to, the fact that low-income weatherization programs constitute cost-effective energy resources and that programs designed to assist low-income customers through education and by other means reduces the percentage of

those customers who might be lost to the Company's system due to inability to pay their bills. Therefore, the proposals and recommendations made by CAPAI are "of concern to the general body of utility users or consumers."

(07) Statement Showing Class of Customer

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

RESPECTFULLY SUBMITTED, this 21st day of December, 2010.


Brad M. Purdy

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 21st day of December, 2010, served a copy of the foregoing document on the following by email and U.S. mail, first class postage.

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DATED, this 21st day of December, 2010

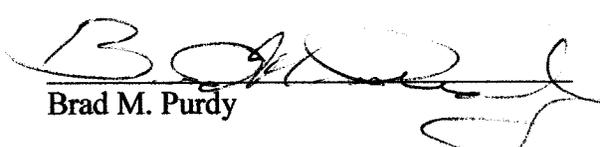

Brad M. Purdy

EXHIBIT "A"
ITEMIZED EXPENSES

Costs:		
	Photocopies/postage	\$145.75
	Total Costs	\$145.75
Fees:		
	Legal (Brad M. Purdy – 116.00 hours @ \$130.00/hr.)	\$15,080.0
	Expert Witness (Teri Ottens – 35.0 hours @ \$50.00/hr.)	\$1,750.00
	Total Fees	\$16,830.00
	Total Expenses	\$16,975.75