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WILLIAM D. OLSON, OF COUNSEL

December 16, 2010

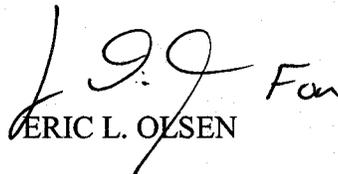
Jean D. Jewell, Secretary
Idaho Public Utilities Commission
PO Box 83720
Boise, Idaho 83720-0074

Re: Case No. PAC-E-10-07

Dear Ms. Jewell:

Enclosed for filing in the captioned matter, please find the original and seven (7) copies of the *Application for Intervenor Funding of the Idaho Irrigation Pumpers Association, Inc.*

Sincerely,


ERIC L. OLSEN

ELO:rg
Enclosures
cc: Service List

RECEIVED
2010 DEC 16 PM 3:26
IDAHO PUBLIC UTILITIES COMMISSION

ORIGINAL



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2010 DEC 16 PM 3:27
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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-10-07**
OF CHANGES TO ITS ELECTRIC SERVICE)
SCHEDULES AND A PRICE INCREASE OF)
\$27.7 MILLION, OR APPROXIMATELY 13.7)
PERCENT)
_____)

**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, regarding the fees and costs associated with the Irrigators participation in the above referenced matter, 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) Rocky Mountain Power ("RMP" or "Company"), a division of PacifiCorp, provides power to thousands of individuals and entities throughout Idaho and is now in the middle of a large expansion program. This building program is planned to significantly increase the amount of Generation, Transmission, and Distribution plants that PacifiCorp has in its service territory. Notwithstanding the great recession, the construction of these new facilities is considered justified based on anticipated need in the future and the Company's and PacifiCorp's obligation to serve and not the inability to meet current demand in these depressed economic times.

RMP filed its application ("Application") seeking authority to put into rate base Idaho's share of the \$4 billion of the new investments and \$87 million of increased net power costs. This amounted to a requested increase in revenue requirement of approximately \$24.9 million or a 12.3% average increase over RMP's current rates.

The Irrigators have participated in all facets of this case and filed the direct testimony of its expert Anthony Yankel and sur rebuttal testimony of its President, Mark Mickelsen. The positions that the Irrigators have asked the Commission to adopt are as follows:

1. Although RMP recognizes that the 2009 Irrigation sales were quite low because of "an unusually wet spring", its weather normalization process does not address precipitation. Using RMP's weather normalized Irrigation sales for the 11 years prior to 2009, it can be projected that in 2010 that the weather normalized Irrigation sales should have been 545,000 MWH (17.7%) higher than used in the Company's filing. The test year Irrigation revenue as well as the Idaho Jurisdictional revenue would be increased \$7 million if a realistic weather normalized Irrigation sales figure would have been used.

2. RMP has assigned too much cost responsibility to the Idaho jurisdiction based upon the energy allocation factor used for Idaho. This energy factor is based upon the same forecast sales data as used to develop the Idaho revenue, but a different (greater) set of losses is applied to these sales than is calculated in the RMP's loss study for Idaho. PacifiCorp uses something referred to as "Border Load" to calculate Idaho's losses for jurisdictional allocation purposes. This Border Load method effectively measures all losses that occur in Idaho. However, only 23% of all of the electricity that enters the Idaho jurisdiction is consumed in Idaho, with the rest of it simply passing through to non-Idaho customers. Idaho customers should not be charged for losses associated with energy that is simply passing through Idaho to serve others.

3. The IIPA concludes that although the Irrigation Load Control Program is a major benefit to the system (provides a great savings for all system customers), the Idaho customers are paying significantly more than the benefit that they are receiving. The IIPA recommends that in the long term (by the next rate case) that this program be treated more as a system benefit where the curtailments are "sold" to the system at their true value. For purposes of this case, a more realistic reduction/credit should be given to Idaho in the Company's jurisdictional allocation model that reflects the actual curtailment that was available during the test year as opposed to the limited (lower) amount that was used in the RMP's filing. Use of actual 2010 curtailment levels as opposed to levels lower than what were even available in 2009 results in a reduction of the revenue requirement by 2.5 million.

4. The IIPA has concerns about the Load Growth Adjustment Rate (“LGAR”) that is a part of the Company’s ECAM proceeding, but the rate is set in this, a general rate case. The LGAR was originally established to keep the RMP from double recovery of growth related power supply costs. An unforeseen problem has arisen with respect to the fact that it was never conceived that load would be decreasing as opposed to increasing between rate cases. Under such circumstances, the LGAR acts as a decoupling mechanism and actually increases rates when load is lost. IIPA recommends that the Commission specify that the LGAR is not a symmetrical adjustment and that it only is used when there is growth between rate cases.
5. The IIPA believes that in light of the adjustments for irrigation sales and the problems with PacifiCorp’s loss study, the Irrigators believe that RMP’s cost of service study (as was the jurisdictional model) does not have an adequate level of test year sales to the Irrigators. The Irrigators also point out that the class cost of service study does not reflect the peak load reduction capability that is available, or even as used in the jurisdictional study. The Irrigators do not present specific adjustments to this study, but simply recommend adoption of the RMP’s proposed increase to the Irrigators that is set at 70% of the jurisdictional average increase.
6. The Irrigators want the Commission to bifurcate the consideration of changes to the Irrigation Load Control Program to allow the Staff, Irrigators and other interested parties proper time to review the same. In the event the Commission will address RMP’s proposed changes in its pending order, then the Irrigators ask that the Commission (1) limit participation to pumps having 30 HP or less, (2) allow the

inclusion of additional language in the tariff similar to Idaho Power's participation selection language, but with the understanding to use it prudently, (3) allow a fixed opt out penalty of \$0.005 per kWh of monthly billing like Idaho Power, and (4) make RMP live up to the terms of its letter agreement to keep the pricing of the Load Control Program at \$30 per kW for the 2011 and 2012 irrigation seasons.

(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 RMP's filing, developing data requests, reviewing data requests, preparing direct and sur rebuttal testimony, preparing for cross examination of RMP's and intervenor witnesses and participating in the technical hearings.

(D) The costs described in Paragraph (A) above constitute a financial hardship for the Irrigators. The Irrigators currently have approximately \$33,005 in the bank with outstanding accounts payable from participation in other cases and this case totaling approximately \$51,350.

The Irrigators are an Idaho nonprofit corporation that was organized in 1968 to represent agricultural 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. Each year mailings are sent to approximately 7,500 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 presumably due to the current depressed economy, increased operating costs and threats 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 this review and settlement. As a result of financial constraints, participation in this review and settlement has been selective and, primarily, on a limited basis.

(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 Irrigators addressed the differential of Jurisdictional Sales and Jurisdictional Allocations. PacifiCorp's case had 2.66% more energy/kWh responsibility attributed to Idaho in the jurisdictional allocation model than what was attributed to Idaho for the calculation of jurisdictional revenues. The reason for this differential was traced to the fact that Pacificorp assigned too much line losses to the Idaho jurisdiction. When the proper amount of energy was run through the JAM and RAM models, RMP proposed rate increase should be reduced by \$5,394,641. This issue was not addressed by Staff or other intervenors.

The Irrigators also pointed out that the test year sales/revenue for the numbers for the residential class were suspect due to the same reasons that Irrigation sales revenue were too low. This issue was not addressed by Staff, but was mentioned by other intervenors.

Since this case will set base net power supply costs, the Irrigators asked to Commission to find that the application of the LGAR in RMP's ECAM should not be applied symmetrically so that in

periods of declining load it does not act like a decoupling mechanism and impute revenue to recover RMP's fixed costs. This issue was not addressed by Staff or other intervenors.

Finally, the Irrigators supported a system allocation of the costs of the Irrigation Load Control Program. In the interim, the Irrigators put forth the proposition to increase the credit flowing to Idaho in the JAM model for actual curtailment available in 2010 rather than the 2009 amounts. This change would result in a reduction in revenue requirement of approximately \$2.5 million. This issue was not addressed by Staff or the other intervenors.

(F) The Irrigator's proposed adjustments resulting from the appropriate amount of transmission losses attributable to Idaho and getting a more appropriate interruption credit in the JAM model for the Load Control Program result in the reduction of RMP's proposed rate increase of approximately \$7.8 million. These reductions directly affect the whole body of customer classes on RMP's Idaho system by benefitting all with a lower average rate increase.

(G) The Irrigators represent the irrigation class of customers under Schedule 24.

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 the 16th day of December, 2010.

RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED

By J. G. J. Fu
ERIC L. OLSEN

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of December, 2010, 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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Daniel E. Solander
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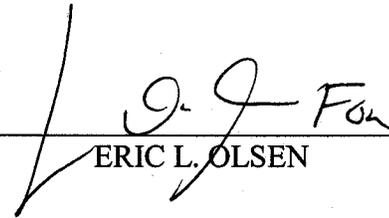

ERIC L. OLSEN

EXHIBIT A

**SUMMARY OF EXPENSES INCURRED BY
IRRIGATORS IN CASE NO. PAC-E-10-07**

1. Legal Fees:

Eric L. Olsen (Partner): 122.4 hrs @ \$185.00 per hour	\$ 22,644.00
Costs: Postage/travel/hotel/meals	\$ <u>1,655.98</u>
Total Legal Fees & Costs:	<u>\$ 24,299.98</u>

2. Consultant Fees:

Anthony J. Yankel: 100 hrs @ \$125 per hour	\$ 60,625.00
Costs: Travel & Meals	\$ 1,930.34
Total Consultant Fees & Cost	<u>\$62,555.34</u>

TOTAL FEES AND EXPENSES: \$86,855.32

Attachment 1

Detail Fee Transaction File List
 RACINE, OLSON, NYE, BUDGE & BAILEY CHARTERED

Trans Date	Atty	Rate	Hours to Bill	Amount	Description
6/1/2010	ELO	185	0.40	74.00	REVIEW AND REVISE PETITION TO INTERVENE AND SEE THAT SAME IS FILED
6/11/2010	ELO	185	0.10	18.50	EMAIL TED WESTON YANKEL'S CONTACT INFORMATION FOR ACCESS TO THE GRID MODEL
6/12/2010	ELO	185	1.20	222.00	TELEPHONE CONFERENCE WITH TONY YANKEL RE: HIS OBSERVATIONS ON REVIEW OF RATE CASE; DRAFT EMAIL TO EXECUTIVE BOARD RE; ISSUES RAISED BY RATE CASE; TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: SAME
6/15/2010	ELO	185	1.60	296.00	EXECUTE PROTECTIVE AGREEMENT AND EMAIL SIGNATURE PAGE TO RMP'S COUNSEL; PREPARE DATA REQUESTS; TELEPHONE CONFERENCE WITH JUDY ERWIN RE: CONFERENCE CALL; EMAIL EXECUTIVE COMMITTEE RE: CONFERENCE CALL; REVISE DATA REQUESTS AND SEE THAT SAME ARE SERVED ON PARTIES
6/17/2010	ELO	185	1.10	203.50	PREPARE FOR AND PARTICIPATE IN IIPA CONFERENCE CALL WITH EXECUTIVE BOARD CONFERENCE CALL; REVIEW EMAIL FROM RMP COUNSEL RE: DATA REQUESTS
7/7/2010	ELO	185	0.30	55.50	SEE THAT DATA REQUESTS ARE PREPARED
7/12/2010	ELO	185	0.20	37.00	REVIEW NOTICE OF PARTIES AND ORDERS FOR INTERVENTION
7/19/2010	ELO	185	0.30	55.50	REVIEW 3RD DATA REQUESTS AND SEE THAT SAME ARE SENT OUT
8/9/2010	ELO	185	0.20	37.00	TELEPHONE CONFERENCE WITH TONY YANKEL RE: STATUS OF REVIEW AND ISSUES TO RAISE IN DIRECT TESTIMONY AND NEED FOR FURTHER DISCOVERY
8/13/2010	ELO	185	1.60	296.00	REVIEW PACIFICORP DIRECT TESTIMONY IN PREPARATION FOR HEARINGS
8/16/2010	ELO	185	0.90	166.50	CONTINUED REVIEW OF RMP DIRECT TESTIMONY
8/17/2010	ELO	185	1.20	222.00	CONFERENCE WITH MARK MICKELSEN RE: ISSUES WITH INTERRUPTIBILITY PROGRAM AND RMP RATE CASE
8/19/2010	ELO	185	0.70	129.50	CONTINUED REVIEW TESTIMONY OF WITNESS MCDUGAL
8/20/2010	ELO	185	1.10	203.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: INFORMATION ABOUT MSP ALLOCATION IN RMP RATE CASE; CONTINUED REVIEW OF RMP DIRECT TESTIMONY
8/23/2010	ELO	185	0.20	37.00	EMAIL TONY YANKEL RE: ISSUES WITH RMP RATE CASE REVIEW
8/24/2010	ELO	185	0.20	37.00	SEE THAT DATA REQUESTS ARE SENT OUT; REVIEW DATA REQUESTS AND SEE THAT SAME ARE PREPARED AND SENT; TELEPHONE CONFERENCE WITH TONY YANKEL RE: REVIEW OF LGAR FOR NEW POWER COSTS
8/25/2010	ELO	185	0.50	92.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: OTHER ISSUES TO EXPLORE IN DATA REQUESTS; EMAL TONY YANKEL RE: ECAM CASE; REVIEW EMAIL ABOUT CLARIFICATIONS OF DATA REQUESTS
8/31/2010	ELO	185	0.20	37.00	TELEPHONE CONFERENCE WITH TONY RE: RMP RATE CASE ISSUES
9/7/2010	ELO	185	0.10	18.50	CALL AND LEAVE MESSAGE WITH TONY YANKEL
9/8/2010	ELO	185	1.40	259.00	CONFERENCE CALL WITH TONY YANKEL AND WITH STAFF REGARDING ISSUE OF ALLOCATION OF COSTS

9/9/2010 ELO	185	0.50	92.50	ASSOCIATED WITH LOAD CONTROL PROGRAM TELEPHONE CONFERENCE WITH TONY YANKEL REGARDING ISSUES WITH RMP RATE CASE AND UPCOMING CONFERENCE CALL WITH RMP ANALYST; GET AND EMAIL DATA REQUEST INFORMATION FOR TONY FOR REVIEW
9/17/2010 ELO	185	0.40	74.00	REVIEW DATA RESPONSES IN RMP CASE; TELEPHONE CONFERENCE WITH TONY YANKEL RE: STATUS OF REVIEW
9/22/2010 ELO	185	0.20	37.00	TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: STATUS OR ROCKY MOUNTAIN RATE CASE
9/24/2010 ELO	185	0.30	55.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: ISSUES TO ADDRESS IN DIRECT TESTIMONY
9/29/2010 ELO	185	0.70	129.50	CONFERENCE RE: ISSUES WITH RMP RATE CASE
10/1/2010 ELO	185	1.70	314.50	CONTINUED REVIEW OF COMPANY TESTIMONY; SEE THAT MISSING DATA REQUESTS ARE SENT TO TONY YANKEL FOR REVIEW
10/4/2010 ELO	185	0.60	111.00	TELEPHONE CONFERENCE WITH LYNN TOMINAGA RE: EXECUTIVE COMMITTEE CONFERENCE CALL; TELEPHONE CONFERENCE WITH SID ERWIN RE: SAME; CALL AND LEAVE MESSAGE WITH YANKEL AND MARK MICKELSEN; EMAIL CONFERENCE CALL INFORMATION
10/5/2010 ELO	185	0.70	129.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: ISSUES TO BE RAISED IN DIRECT TESTIMONY
10/6/2010 ELO	185	0.20	37.00	EMAIL EXECUTIVE COMMITTEE RE: DRAFT TESTIMONY ADVANCE OF CONFERENCE CALL
10/11/2010 ELO	185	3.60	666.00	REVIEW AND REVISE YANKEL DIRECT TESTIMONY
10/13/2010 ELO	185	5.00	925.00	REVIEW AND REVISE YANKEL'S DIRECT TESTIMONY; CONFERENCE WITH YANKEL RE: DIRECT TESTIMONY; PREPARE EXHIBITS FOR FILING
10/14/2010 ELO	185	2.10	388.50	FINALIZE DIRECT TESTIMONY OF TONY YANKEL AND THAT SAME IS FILED AND SERVED ON THE PARTIES
10/19/2010 ELO	185	0.60	111.00	TELEPHONE CONFERENCE WITH TONY YANKEL RE: POSITIONS OF OTHER PARTIES IN RATE CASE; TELEPHONE CONFERENCE WITH DANIEL SOLANDER RE: GETTING COPIES OF WORK PAPERS; TELEPHONE CONFERENCE IWHT TONY YANKEL RE: GETTING COPIE OF WORK PAPERS FOR OTHER PARTIES
10/20/2010 ELO	185	0.30	55.50	TELEPHONE CONFERENCE WITH TONY YANKEL RE: REVIEW OF OTHER PARTY'S TESTIMONY
10/21/2010 ELO	185	1.00	185.00	REVIEW OTHER INTERVENOR DIRECT TESTIMONY
10/22/2010 ELO	185	1.20	222.00	CONTINUED REVIEW DIRECT INTERVENOR TESTIMONY
10/25/2010 ELO	185	0.20	37.00	REVIEW COMMISSION ORDER RE: MONSANTO INTERRUPTIBILITY HEARINGS; EMAIL TONY YANKEL SAME
10/25/2010 ELO	185	0.80	148.00	CONTINUED REVIEW OF INTERVENOR DIRECT TESTIMONY
10/27/2010 ELO	185	2.50	462.50	CONTINUED REVIEW OF INTERVENOR DIRECT TESTIMONY
11/1/2010 ELO	185	0.90	166.50	PREPARE FOR AND PARTICIPATE IN EXECUTIVE BOARD CONFERENCE CALL REGARDING ISSUES AND STATUS OF RMP RATE CASE
11/2/2010 ELO	185	0.20	37.00	REVIEW REVISIONS TO DIRECT TESTIMONY
11/5/2010 ELO	185	2.60	481.00	REVIEW STAFF AND OTHER INTERVENOR DIRECT TESTIMONY
11/8/2010 ELO	185	0.20	37.00	REVIEW ORDER ON PUBLIC HEARINGS; EMAIL NOTICE EXECUTIVE BOARD
11/18/2010 ELO	185	2.00	370.00	CONTINUED REVIEW OF INTERVENOR DIRECT

11/19/2010 ELO	185	3.20	592.00	TESTIMONY AND RMP REBUTTAL TESTIMONY; SEE THAT ADDITIONAL DATA REQUESTS ARE SERVED; CONFERENCE WITH TONY YANKEL REGARDING SAME PARTICIPATE IN EXECUTIVE BOARD CONFERENCE CALL REGARDING ISSUES IN RMP RATE CASE; DRAFT MOTION TO PROVIDE SUR REBUTTAL TESTIMONY OF MARK MICKELSEN; TELEPHONE CONFERENCE WITH SCOTT WOODBURY REGARDING SAME; EMAIL EXECUTIVE COMMITTEE; DRAFT SUR REBUTTAL TESTIMONY OF MARK MICKELSEN
11/22/2010 ELO	185	1.60	296.00	CONTINUED DRAFTING OF SUR REBUTTAL TESTIMONY OF MARK MICKELSEN
11/22/2010 ELO	185	3.30	610.50	CONTINUED REVIEW OF RMP REBUTTAL TESTIMONY IN PREPARATION FOR CROSS EXAMINATION
11/23/2010 ELO	185	3.80	703.00	REVIEW DIRECT TESTIMONY OF GARY GRAYSON; REVIEW REBUTTAL TESTIMONY OF CAROL HUNTER; CONTINUED DRAFTING OF TESTIMONY OF MARK MICKELSEN
11/23/2010 ELO	185	3.60	666.00	CONTINUED REVIEW OF RMP BEBUTTAL TESTIMONY IN PREPARATION FOR TECHNICAL HEARING
11/24/2010 ELO	185	2.20	407.00	CONTINUED REVIEW OF RMP REBUTTAL TESTIMONY IN PREPARATION FOR TECHNICAL HEARING
11/26/2010 ELO	185	2.00	370.00	FINALIZE DRAFT OF SUR REBUTTAL TESTIMONY AND EMAIL FOR REVIEW
11/26/2010 ELO	185	2.00	370.00	PREPARE CROSS EXAMINATION QUESTIONS FOR COMPANY WITNESSES
11/27/2010 ELO	185	2.50	462.50	TELEPHONE CONFERENCE WITH YANKEL AND MICKELSEN; REVISE SUR REBUTTAL TESTIMONY; CONTINUED PREPARATION OF CROSS EXAMINATION QUESTIONS
11/28/2010 ELO	185	2.40	444.00	CONTINUED PREPARATION OF CROSS EXAMINATION QUESTIONS FOR COMPANY WITNESSES
11/29/2010 ELO	185	10.70	1,979.50	FINALIZE TESTIMONY OF MARK MICKELSEN; SEE THAT MOTION AND SUR REBUTTAL TESTIMONY ARE FILED AND SERVED; CONTINUED PREPARATION FOR HEARING AND CROSS EXAMINATION OF COMPANY WITNESSES
11/29/2010 ELO	185	3.50	647.50	TRAVEL TO BOISE
11/30/2010 ELO	185	9.50	1,757.50	PREPARE CROSS EXAMINATION QUESTIONS; ATTEND TECHNICAL HEARINGS AND CROSS EXAMINE COMPANY WITNESSES
11/30/2010 ELO	185	4.00	740.00	PREPARE FOR TECHNICAL HEARINGS AND CROSS EXAMINATION OF COMPANY WITNESSES
12/1/2010 ELO	185	9.70	1,794.50	PREPARE FOR HEARINGS; PARTICIPATE IN HEARINGS AND CROSS EXAMINE COMPANY WITNESSES
12/1/2010 ELO	185	3.00	555.00	PREPARE CROSS EXAMINATION FOR COMPANY WITNESSES
12/2/2010 ELO	185	8.90	1,646.50	PARTICIPATE IN TECHNICAL HEARINGS AND CROSS EXAMINE COMPANY WITNESSES; PRESENT HIPA CASE AND WITNESSES
12/16/2010 ELO	185	4.50	832.50	PREPARE APPLICATION FOR INTERVENOR FUNDING
		<u>122.40</u>	<u>22,644.00</u>	

Detail Const Transaction File List
RACINE, OLSON, NYE, BUDGE & BAILY CHARTERED

Trans			
Date	Atty	Amount	Description
7/26/2010	ELO	152.52	TELEPHONE CONFERENCE CALL - 6/17
8/19/2010	ELO	73.96	POSTAGE 8/10 - ANTHONY YANKEL
9/23/2010	ELO	24.61	POSTAGE 9/14 - ANTHONY YANKEL
9/23/2010	ELO	23.59	POSTAGE 9/17 - ANTHONY YANKEL
9/30/2010	ELO	2.68	POSTAGE
9/30/2010	ELO	14.20	POSTAGE
10/13/2010	ELO	55.91	UPS POSTAGE ADJUSTMENT FROM 9/8/2010
11/17/2010	ELO	325.67	ELO CONFERENCE CALL - 10/7/2010
12/3/2010	ELO	234.00	RT MILEAGE POCATELLO-BOISE - 11/29
12/3/2010	ELO	748.84	LODGING AND MEALS - 11/29-12/3
		<u>1,655.98</u>	

Attachment 2

Date	Pacifcorp	<u>Description</u>
June 10	3	Review cost of service study filed in case; review testimony of Company witness Walje.
11	6	Review testimony and exhibits of other company witnesses.
14	6	Develop first set of interrogatories for the Company; discuss with Olsen the general problems I see with the Company's filing.
15	5	Continue to develop interrogatories by review the Company's filing in this case and comparing it to some of the changes that have occurred since the last case.
16	2	Review filing for details regarding sales and sales adjustments; conversation with Olsen and others regarding direction of case and issues reviewed thus far.
18	2	Review initial data responses provide by PacifCorp to Monsanto.
21	2	Further review initial data responses provide by PacifCorp to Monsanto and the various attachments.
23	3	Review result of cost of service study and the variables that are contained in it.
25	4	Review data responses provided to Monsanto.
28	4	Review data responses provided to Monsanto; develop issues with respect to the relationship between cost of service and bill/sales; review different aspects of the treatment of the interruptible load on a system basis.
29	5	Review all of the confidential material that was finally provided by the Company.
30	3	Review data responses provided to Monsanto.
July 1	3	Review data responses to Irrigator's requests; review spreadsheet information
2	4	Review data responses to Irrigator's requests; review spreadsheet information
14	8	Review data responses to Irrigator's requests; review spreadsheet information provided; develop follow-up questions.
15	7	Review data responses to Irrigator's requests; review spreadsheet information provided; develop follow-up questions.
16	7	Review data responses to Irrigator's requests; review spreadsheet information provided; develop more follow-up questions.

Date	PacifiCorp	<u>Description</u>
17	5	Continue to develop additional data requests that are follow-up to what was provided; send to Olsen.
19	4	Continue to review data responses in a manner to coordinate the data in the responses that should be similar; determine what responses are missing and request the same.
21	6	Review the various reports filed by the Company regarding losses by jurisdictions; review company reports regarding demand side management projects and their cost/benefit.
23	4	Review the differences in the data used in the Net Power Cost model with the historic data regarding system load; review impact, or lack there of associated with the Irrigation load management program on the costs calculated by the Company.
27	4	Review the missing data responses that had arrived; develop follow-up questions.
29	5	Develop follow-up interrogatories regarding the Company's cool keeper program in Utah and what the numbers mean that were provided in response to IIPA request 12; review the historic sales levels and the projections used in this case.
30	3	Review development of Irrigation historic billing and compare weather normalized and actual.
Aug. 3	5	Review data response regarding weather normalization of Irrigation load and other loads; compare historical Irrigation loads with normalized loads.
5	6	Review weather normalization adjustments of Irrigation customers in the Idaho Power service are and compare with that proposed by PacifiCorp; develop
6	6	Review data responses and formulate data from various sources for consistency in the establishment of the level of Irrigation curtailment for the test year; develop interrogatories.
9	8	Review data responses and review usage and load research data in order to understand forecasting and weather normalization; develop additional
10	8	Review data responses and review usage and load research data in order to understand forecasting and weather normalization; develop additional
11	2	Review hourly distribution data that was provided and how it varied and how it was normalized for 2010.

Date	PacifiCorp	<u>Description</u>
12	8	Work with data provided by the Company to establish what may be going on with the manner in which the irrigation load is normalized; investigate the difference between hourly data between various years.
13	8	Review data responses to Monsanto and the Commission staff; develop additional interrogatories.
16	6	Review hourly border data and compare to load survey data in order to review losses and discrepancies.
17	7	Review hourly border data and compare to load survey data in order to review the differences between the two; attempt to define the reason for the differences in the two data sets and why the June and August data are so different than the rest of the year.
18	6	Review material supplied by Olsen; address the direction of the credit paid to Irrigators and the payment of that credit by the Idaho jurisdiction; conversation with Irrigators; review discovery responses to see if more interrogatories are needed.
19	8	Review the responses to all of the responses to Monsanto data requests sets 1-7; where appropriate, review associated data on CD that was provided.
20	7	Review hourly border data for 2009 and compare it to load research data; develop relationships between the percentage difference in the two data sets with respect to day of the week and time of day
23	7	Develop additional interrogatories and send them to Olsen; review ECAM and past material to see what needs to be done about a negative LGAG.
24	8	Review data responses to the Commission Staff; develop and submit addition data requests.
25	6	Review weatherization adjustments and load research data; write additional interrogatories.
26	7	Work on load research data and border load data to coordinate the two; develop and submit interrogatories.
31	5	Review some of the data responses that recently came to the Staff and Monsanto.
Sept 2	3	Prepare for and attend (via phone) a conference with the Irrigators and PacifiCorp regarding the treatment of the interruptibility program in the present rate case.

Date

PacifiCorp

Description

- | Date | PacifiCorp | Description |
|------|------------|---|
| 3 | 6 | Review alternative ways to address the treatment of the irrigation interruptibility that would reflect some sort of jurisdictional allocation and yet satisfy the concerns raised by the Company that it could not continue the program without collecting all |
| 7 | 8 | Review recent data responses that came in; work on jurisdictional programs in order to determine how to get them to work; discuss the same and other topics with Commission Staff; get the jurisdictional models to work. |
| 8 | 7 | Continue to work on the sales level forecasts in order to determine how data is put together and the validity of the data used in the jurisdictional model for Idaho as well as all of the other jurisdictions such that Idaho's allocation seems to be increasing or at least quite erratic; prepare for and have conference call with the Staff regarding the concerns regarding situs treatment that were raised by the Company. |
| 9 | 2 | Prepare for and attend telephone conference with PacifiCorp and parties to the case in order to get a better explanation of how the company forecasts sale and load. |
| 13 | 5 | Review sales forecast for irrigators and compare forecast to historic normalized irrigation loads as well as variations between model predictions (based upon actual weather) and actual usage. |
| 15 | 7 | Review the calculation of the level of sales associated with Idaho revenues and those attributed to Idaho via the jurisdictional projection; work to develop the relationship between border loads and those predicted by load research. |
| 16 | 5 | Develop the relationship between border loads and those predicted by load research for 2009. |
| 17 | 6 | Review load research data for the irrigators in order to piece together how irrigation customers impact the system load for those that are on-peak as well as those that are not. |
| 20 | 7 | Develop relationships using responses to irrigation requests 5, 22, and 26 in order to get a better, long-term perspective of irrigation sales for use as a forecast |
| 21 | 5 | Review multiple data responses that were provided by Eric; work with irrigation load research data to get a better understanding of what the company is referring to regarding what it calls "free-riders". |
| 22 | 6 | Work with irrigation load research data to get a better understanding of what the company is referring to regarding what it calls "free-riders". |
| 23 | 5 | Work with the Company's COS model in order to make it run; conversations with Staff regarding same; test the workings of the model. |

Date	PacifiCorp	<u>Description</u>
24	7	Work with JAM and RAM models in order to figure out how they work; conversations with the Staff and the Company regarding the same; work with model to develop test data to insure that changes can be made.
27	6	Review additional data responses that have been provided, with emphasis on responses to Monsanto set 13; outline testimony to be written regarding the low level of irrigation sales; develop possible exhibits.
28	7	Begin to draft testimony regarding the inappropriate level of normalized sales for the irrigators; demonstrate how off the values are using graphs of historic data.
29	7	Develop graphs for testimony; write testimony regarding irrigation sales levels; review impact of changing sales on irrigation demand levels.
30	7	Develop testimony regarding the problems with the residential usage data and how it is similar to the normalization of the irrigation data; prepare for and attend conference call with the Company regarding the status of the irrigation load management program.
Oct	1	6 Finalize draft of normalized irrigation sales testimony.
	4	9 Develop testimony and data that demonstrates the fact that Idaho is being charged too much in the way of losses compared to what is appropriate.
	5	10 Write testimony regarding the level of extra sales being assigned to Idaho and coordinate that with the testimony regarding irrigation sales being too low.
	6	9 Write testimony regarding the load management program and how it should be treated in the case; review exhibits and possible data to incorporate.
	7	8 Finalize draft of testimony; review of 3-year agreement with PacifiCorp; discussion with Olsen and then with the Board regarding positions; discussion with Pacificorp regarding irrigation program; rap-up with board.
	11	7 Review testimony as a unit; revise wording to clarify; insure that calculations were correct.
	12	8 Go over numbers and tables; develop tables in a different format so that they go into the text with more clarity; revise numbers as appropriate.
	13	7 Develop exhibits as needed; make changes to text to corrected wording problems to the draft per conversation with Olsen.
	14	4 Do final review and make corrections as needed.
	18	2 Read testimony of the Staff.

Date	PacifiCorp	<u>Description</u>
19	2	Read testimony of the industrial intervenors.
20	4	Read testimony of Reading; conversations with Olsen; develop workpapers requested by the Company.
21	6	Find and/or develop workpapers for submittal to Company; rerun RAM and JAM in order to give to the Company.
25	5	Read testimony of Monsanto witness Collins as it impacts the Monsanto interruptions and as it impacts the credit to the Irrigators; read testimonies of Iverson, Peseau, Smith, and Widmer for Monsanto.
27	1	Discussion with Staff regarding testimony filed last week; calculate impact of changes to page 24 of my testimony.
Nov 3	3	Prepare for meeting regarding my testimony and workpapers in the PacifiCorp case with the staff; meet with members of the Commission staff to discuss case and the PacifiCorp load management program.
5	4	Meeting with the Commission staff to discuss meeting that took place with the Company; phone conference with the Company and the Irrigators regarding the load management program and situs treatment.
10	1	Conversation with staff regarding workpapers and calculations as well as meetings with the company.
18	1	Develop additional interrogatories based upon Hunter's rebuttal testimony.
19	5	Develop policy type cross for Walje, develop cross for Tallman regarding used and useful, develop some cross for Hunter regarding her proposed changes to the load management program.
22	3	Develop additional cross for Hunter regarding the proposed changes to the load management program.
23	3	Develop additional cross for Gerrard regarding new transmission plant and for Hui Sho.
24	7	Develop cross for Eelkema regarding his position regarding sales level for the irrigators.
26	3	Develop cross for McDougal regarding losses assigned to Idaho.
27	4	Work with Olsen and Mickelsen to develop Mickelsen's testimony.
29	6	Review testimony and prepare for hearing; review all material needed for hearing regarding my testimony and the crossexamination that we will do; response to questions by Olsen.

Date	Pacificorp	<u>Description</u>
30	8	Travel to Boise, review testimony, perpare for hearing, attend hearing.
Dec 1	8	Attend hearing and assist Olsen with crossexamination.
2	6	Attend hearing and assist Olsen with crossexamination.
3	6	Follow-up review on the hearing; review of interruptibly credit, travel home.

Total 485

@ \$125 per hour = \$60,625

TRAVEL EXPENSE

Date	Lodging	Meals	Transportation
3-Nov		\$45.00	\$897.80 Air Line
4-Nov		\$45.00	
5-Nov		\$45.00	\$99.23 car
30-Nov		\$45.00	\$511.80 Air Line
1-Dec		\$45.00	
2-Dec		\$45.00	
3-Dec		\$45.00	\$106.51 car
Subtotals	\$0.00	\$315.00	\$1,615.34
Total Travel Expense			\$1,930.34