

certain amount to irrigators for them to essentially stand by. It is also appropriate to pay a certain amount to irrigators when RMP actually curtails their loads. What is inappropriate is the current incentive that pays irrigators the same credit regardless of the actual utilization of the program.

Splitting the current fixed payment to a fixed/variable scheme minimizes costs to ratepayers while maximizing the value to RMP. It minimizes costs by ensuring ratepayers pay the full incentive only during actual curtailments. It maximizes value by incentivizing participants to actually curtail and thereby receive the payment. Unfortunately, RMPs application and the testimony of Ms. Hunter do not provide sufficient detail or analysis to determine if \$25.30 per kilowatt is an appropriate incentive level. Assuming it is, ICL supports the 75%/25% split adopted for Idaho Power.

ICL believes opt-out penalties are important to ensure the amount of load curtailment RMP expects to have available actually responds when needed. ICL supports RMP proposed revision because it is clear and simple for the participants. This change should allow irrigators to quickly determine the cost of the penalty will outweigh the benefit of opting out. However, if the Commission decides to enact a fixed/variable credit scheme, then ICL proposes an opt-out penalty based on a fixed dollar per kilowatt, similar to that recently adopted for Idaho Power.

WHEREFORE, ICL respectfully requests the Commission consider these comments.

DATED this 21th day of March 2011.

Respectfully submitted,

Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

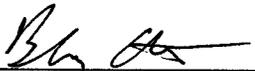
I hereby certify that on this 21st day of March, 2011 true and correct copies of the foregoing COMMENTS OF IDAHO CONSERVATION LEAGUE were delivered to the following persons via the method of service noted:

Hand delivery:

Jean Jewell
Commission Secretary (Original and seven copies provided)
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983

Electronic Mail:

Mark C. Moench
Daniel E. Solander
Yvonne R. Hogle
PacifiCorp/dba Rocky Mountain Power
201 S. Main St., Suite 2300
Salt Lake City, UT 84111
Daniel.Solander@pacificorp.com
Mark.moench@pacificorp.com
Yvonne.hogle@pacificorp.com



Benjamin J. Otto
Idaho Conservation League