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December 22, 2011

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

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

Re: Case No. PAC-E-11-12

Dear Ms. Jewell:

Enclosed for filing please find an original and seven (7) copies of the Application of Intervenor Funding for Idaho Irrigation Pumpers Association.

Sincerely,


ERIC L. OLSEN

ELO:rg
Enclosures
cc: Service List

Eric L. Olsen, ISB No. 4811
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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Intervenor
Idaho Irrigation Pumpers Association, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
PACIFICORP, DBA ROCKY MOUNTAIN) **CASE NO. PAC-E-11-12**
POWER, FOR APPROVAL OF CHANGES)
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 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 that support the legal and consultant time spent in this case are available upon request.

(B) This case was filed on May 27, 2011. The Irrigators immediately intervened and began reviewing the case. The Irrigators submitted to Rocky Mountain Power approximately 74 data requests and reviewed the responses thereto, along with reviewing the other data responses that Rocky Mountain Power provided to the other parties in this case. The Irrigators asserted in the settlement

process that Rock Mountain Power is allocating a disproportionate share of costs to the Idaho jurisdiction because it is using an erroneous MWH sales number for the Idaho jurisdiction to derive the allocators. The Irrigators also developed revenue normalization adjustments for the residential and irrigation customer classes that were asserted in the settlement negotiations and which ultimately formed a basis for the settlement of this case. These proposed adjustments were provided to all the parties and discussed with Commission Staff. The Irrigators actively participated in the settlement negotiations that were held in this case and signed the Stipulation. The Irrigators now urge the Commission to adopt the Stipulation as a fair, just and reasonable resolution of the issues dealt with therein. Notwithstanding the settlement, the Irrigators had to prepare and approached this case as if it would have gone to a full blown technical hearing on the merits of all issues presented. (C)

The expenses and costs incurred by the Irrigators set forth in Exhibit A are reasonable in amount and were necessarily incurred. The expenses and costs were incurred in reviewing the Company's filing, preparing and reviewing approximately 74 Irrigator data requests and responses, preparing settlement positions on revenue requirement issues, participating in settlement conferences/negotiations that resulted in the Stipulation, reviewing the Stipulation language, and in participating in the recent technical hearings to support the adoption of the Stipulation by the Commission.

(D) The costs described in Paragraph (A) above constitute a financial hardship for the Irrigators. The Irrigators currently have approximately \$27,784.81 in the bank with outstanding accounts payable from this case and the pending Idaho Power general rate case totaling approximately \$46,070.75. This leaves us at a current deficit of approximately \$18,285.94. Participating in the more frequent general rate cases has been taxing on the Irrigators' limited resources.

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 just finished participating in Idaho Power's general rate case. This concurrent participation in the Idaho Power proceedings has added additional financial strain on the organization this year.

(E) The Irrigators' positions urged in the settlement negotiations were different with respect to the jurisdictional revenue requirement and similar to Commission Staff proposed adjustments to normalize or increase class revenue for the residential and irrigation class. However, they materially

differed in that the jurisdictional revenue adjustment was unique the Irrigators and the Irrigators' revenue adjustment was larger than that proposed by the Commission Staff. As a signatory of the Stipulation, the Irrigators necessarily are aligned with Commission Staff in urging the Commission adopt the Stipulation.

(F) The Irrigators' participation addressed issues of concern to the general body of users or consumers on Rocky Mountain Power's system by reducing its alleged revenue requirements. This reduction is embodied in the Stipulation.

(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 pursuant to Idaho Code § 61-617A and IDAPA 31.01.01.161 through .165 in such amount as determined by the Commission.

DATED this 22nd day of December, 2011.

RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED

By 
ERIC L. OLSEN

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 22 day of December, 2011, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

Jean D. Jewell, Secretary	<u> X </u> U.S. Mail/Postage Prepaid
Idaho Public Utilities Commission	<u> </u> E-Mail
P.O. Box 83720	<u> </u> Facsimile
472 W/ Washington Street	<u> </u> Overnight Mail
Boise, Idaho 83720-0074	<u> </u> Hand Delivered
<u>jjewell@puc.state.id.us</u>	

Ted Weston	<u> </u> U.S. Mail/Postage Prepaid
Idaho Regulatory Affairs Manager	<u> X </u> E-Mail
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Salt Lake City, UT 84111	<u> </u> Overnight Mail
<u>ted.weston@pacificorp.com</u>	<u> </u> Hand Delivered

Daniel E. Solander	<u> </u> U.S. Mail/Postage Prepaid
PacifiCorp/dba Rocky Mountain Power	<u> X </u> E-Mail
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ERIC L. OLSEN

EXHIBIT A

SUMMARY OF EXPENSES INCURRED BY IRRIGATORS
IN CASE NO. PAC-E-11-12

1. Legal Fees:

Eric L. Olsen (Partner):

53.4 hrs @ 185.00 per hour \$ 9,879.00

Costs:

Mileage, Hotel, Meals \$ 1,403.96

Total Work and Costs: \$11,282.96

2. Consultant Anthony J. Yankel:

201 hrs @ \$125 per hour \$25,125.00

Expenses:

Travel, room and meals \$ 0.00

Total Work and Costs: \$25,125.00

TOTAL FEES AND EXPENSES: \$36,407.96