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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Snake River Alliance

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER COMPANY'S
PETITION TO MODIFY TERMS AND CONDITIONS
OF PURPA PURCHASE AGREEMENTS

CASE NO. IPC-E-15-01

IN THE MATTER OF AVISTA CORPORATION'S
PETITION TO MODIFY TERMS AND CONDITIONS
OF PURPA PURCHASE AGREEMENTS

CASE NO. AVU-E-15-01

IN THE MATTER OF ROCKY MOUNTAIN POWER
COMPANY'S PETITION TO MODIFY TERMS AND
CONDITIONS OF PURPA PURCHASE AGREEMENTS

CASE NO. PAC-E-15-03

SNAKE RIVER ALLIANCE
PETITION FOR INTERVENOR
FUNDING

COMES NOW, the Snake River Alliance (“Alliance”), pursuant to Idaho Code § 61-617A and IDAPA 31.01.01.161-165, with this petition for intervenor funding. The Alliance is an intervenor in this case pursuant to Order No. 33222. This petition is timely pursuant to the Commission’s instruction at the Technical Hearing on June 30 to submit such applications by July 10, 2015.

I. Intervenor Funding is Appropriate in this Case.

Intervenors may apply for funding in any case involving regulated electric utilities with gross Idaho intrastate annual revenues exceeding \$3,500,000. Idaho Code § 61-617A and IDAPA 31.01.01.161. Idaho Power Company, Rocky Mountain Power, and Avista Corporation are regulated electric public utilities and each have gross Idaho intrastate annual revenues exceeding \$3,500,000.

II. The Alliance Meets the Standards for Granting Intervenor Funding.

Pursuant to Rule 162, the Alliance submits the following information demonstrating qualification for intervenor funding.

a. Itemized List of Expenses.

The Attached Exhibit A is an itemized list of legal expenses incurred by the Alliance in this proceeding. Exhibit A indicates the time spent reviewing the three utilities' applications for relief, drafting Alliance pleadings and reviewing pleadings filed by other parties, reviewing discovery, legal research and analysis, preparing and filing the direct testimony of Ken Miller¹, reviewing direct and rebuttal testimony of other parties, conferring with experts and other parties, and preparing for and participating in the prehearing conference and technical hearing.

b. Statement of Proposed Findings.

The Alliance proposes that the Commission maintain the 20-year contract term and supports the adoption of a change to the contracts to include an adjustment to the energy component of the rate after year 10 for the remainder of the contract term. The Alliance also asks the Commission to grant this petition for intervenor funding.

¹ The Alliance is not seeking Intervenor funding for Mr. Miller's time.