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IDAHO PUBLIC
UTILITIES COMMISSION

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Sup-E-10-02

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Attorneys for the Idaho Association of Highway Districts, the
Association of Idaho Cities and the Idaho Association of Counties

IN THE SUPREME COURT OF THE STATE OF IDAHO

IN THE MATTER OF THE APPLICATION)
OF IDAHO POWER COMPANY TO)
MODIFY ITS RULE H LINE EXTENSION)
TARIFF RELATED TO NEW SERVICE)
ATTACHMENTS AND DISTRIBUTION)
LINE INSTALLATIONS.)

AFFIDAVIT OF DAVID E. WYNKOOP
IN SUPPORT OF MOTION TO FILE
AMICUS CURIAE BRIEF

ADA COUNTY HIGHWAY DISTRICT,)

Petitioner/Appellant,)

vs.)

Supreme Court Docket No. 37294-2010
Idaho Public Utilities Commission No.
IPC-E-08-22

IDAHO PUBLIC UTILITIES COMMISSION,)

Respondent on Appeal,)

and)

IDAHO POWER COMPANY,)

Respondent/Respondent on Appeal.)

David E. Wynkoop, being first duly sworn upon oath, deposes and states as follows:

1. I am counsel for the Idaho Association of Highway Districts. In this matter, I am also serving as counsel for the Association of Idaho Cities and the Idaho Association of Counties.

2. I am duly admitted to the practice of law before this Court and the courts of the State of Idaho.

3. I have personal knowledge of the matters herein referred to, and make this Affidavit in support of the Motion to File Amicus Brief filed herein by the Idaho Association of Highway Districts, the Association of Idaho Cities and the Idaho Association of Counties.

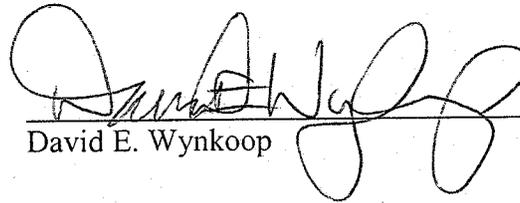
4. The Association of Idaho Cities is an association of 190 cities throughout the state of Idaho. The public rights-of-way within these cities fall within the jurisdiction of many city street departments and some highway districts, many of which have policies or regulations related to the relocation of utility lines on the rights-of-way within their respective communities.

5. The Idaho Association of Counties is an association of 44 counties throughout the state of Idaho. The public rights of way within these counties fall within the jurisdiction of many different county road departments and highway districts, many of which have policies or regulations related to the relocation of utility lines on the rights-of-way within their respective highway districts.

6. The Idaho Association of Highway Districts is an association of 64 highway districts throughout the state of Idaho. Many of those highway districts have policies or regulations related to the relocation of utility lines on the rights-of-way within their respective highway districts.

7. I have reviewed Idaho Power's Rule H Tariff and the Idaho Public Utilities Commission's Order No. 30955 approving Idaho Power's Rule H Tariff. I believe a decision in this appeal will affect each of the entities that have joined in this motion.

8. The Idaho Association of Highway Districts, the Association of Idaho Cities and the Idaho Association of Counties requests permission to jointly file one single Amicus Brief in this matter. They do not request permission to participate in oral argument.

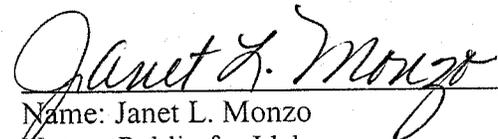


David E. Wynkoop

STATE OF IDAHO)
) ss.
County of Ada)

SUBSCRIBED AND SWORN before me this 18 day of June, 2010.





Name: Janet L. Monzo
Notary Public for Idaho
Residing at Meridian, Idaho
My commission expires 10-14-2015

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18 day of June, 2010, I caused to be served a true copy of the foregoing AFFIDAVIT OF DAVID E. WYNKOOP IN SUPPORT OF MOTION TO FILE AMICUS CURIAE BRIEF by the method indicated below, and addressed to each of the following:

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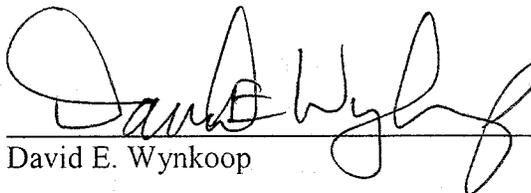
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