John R. Hammond, Jr. – ISB No. 5470

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IDAHO PUBLIC UTILITIES COMMISSION

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Attorneys for the Snake River Alliance and NW Energy Coalition

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE) Case No. IPC-E-17-13
APPLICATION OF IDAHO POWER)
COMPANY FOR AUTHORITY TO) AFFIDAVIT OF JOHN R. HAMMOND,
ESTABLISH NEW SCHEDULES FOR) JR. IN SUPPORT OF INTERVENOR
RESIDENTIAL AND SMALL) FUNDING
GENERAL SERVICE CUSTOMERS)
WITH ON-SITE GENERATION)
STATE OF IDAHO)	
) ss.	
County of Ada)	

JOHN R. HAMMOND, JR., being first duly sworn upon oath, deposes and says as follows, to-wit:

- I am the attorney of record for the Snake River Alliance, a non-profit organization, and the NW Energy Coalition, a non-profit organization (collectively, the "SRA Intervenors") and make this Affidavit based on my own knowledge.
- 2. I have been licensed to practice law continuously in Idaho since 1996. A part of my practice is in the area of public utility law. In my practice I have participated in several Idaho Public Utilities Commission (the "Commission") technical hearings and argued in one appeal involving utility law in front of the Idaho Supreme Court.

- 3. My current hourly rate for legal services in public utility cases \$250.00, which I believe to be reasonable in light of my knowledge and experience.
- 4. For the purpose of this case I have reduced my hourly rate to \$200.00, taking into account the SRA Intervenors' limited financial resources and the public interest nature of the representation.
- 5. Attached hereto an incorporated herein by reference as <u>Exhibit A</u> is an itemized schedule of time expended and costs incurred in the representation of the SRA Intervenors in this matter. All of the time and costs were reasonably incurred given the complexity of the issues involved in the matter, which included, but was not solely limited to:
 - a. the preparation of pleadings,
 - b. review of discovery responses,
 - c. participation in conferences with intervening parties,
 - d. preparation of direct and rebuttal testimony of the SRA Intervenors' expert witness,
 - e. Review of all parties direct, rebuttal and surrebuttal prefiled testimony,
 - f. Attendance at the public hearing at the Commission in Boise, Idaho,
 - g. Review of written comments filed by the public,
 - h. Preparation for the technical hearing in this matter, and
 - i. Participation in the technical hearing for this matter at the Commission on March 8-9, 2018.

FURTHER YOUR AFFIANT SAITH NAUGHT.

[signature page follows]

SUBSCRIBED AND SWORN to before me this 22 day of March, 2018.

Notary Public for Idaho

Residing at: MIDDLETON, 10

Commission Expires: 1/25/2024

I HEREBY CERTIFY that on the day of March, 2018, I served a true and correct copy of the foregoing by delivering the same to each of the following individuals by electronic mail, addressed as follows:

IDAHO POWER COMPANY:	
Lisa Nordstrom Idaho Power Company 1221 W. Idaho St. (83702) PO Box 70 Boise, ID 83707 Inordstrom@idahopower.com dockets@idahopower.com	 □ U.S. Mail □ Facsimile □ Overnight Mail □ Hand Delivery ⋈ Electronic Mail
Timothy E. Tatum Connie Aschenbrenner Idaho Power Company 1221 W. Idaho St. (83702) PO Box 70 Boise, ID 83707 ttatum@idahopower.com caschenbrenner@idahopower.com	 □ U.S. Mail □ Facsimile □ Overnight Mail □ Hand Delivery ⋈ Electronic Mail
COMMISSION STAFF: Sean Costello Deputy Attorney General Idaho Public Utilities Commission 472 W. Washington (83702) PO Box 83720 Boise, ID 83720-0074 sean.costello@puc.idaho.gov IDAHYDRO:	 □ U.S. Mail □ Facsimile □ Overnight Mail □ Hand Delivery ⋈ Electronic Mail
Idahydro c/o C. Tom Arkoosh Arkoosh Law Offices 802 W. Bannock Street, Suite 900 PO Box 2900 Boise, ID 83701 tom.arkoosh@arkoosh.com erin.cecil@arkoosh.com	 □ U.S. Mail □ Facsimile □ Overnight Mail □ Hand Delivery ⋈ Electronic Mail

IDAHO IRRIGATION PUMPERS ASSOCIATION, INC.:

Idaho Irrigation Pumpers Association, Inc. c/o Eric L. Olsen Echo Hawk & Olsen, PLLC 505 Pershing Avenue, Ste. 100 PO Box 6119 Pocatello, ID 83205 elo@echohawk.com	 □ U.S. Mail □ Facsimile □ Overnight Mail □ Hand Delivery ⋈ Electronic Mail
Anthony Yankel 12700 Lake Avenue, Unit 2505 Lakewood, OH 44107 tony@yankel.net	 □ U.S. Mail □ Facsimile □ Overnight Mail □ Hand Delivery ⋈ Electronic Mail
IDAHO CONSERVATION LEAGUE:	
Matthew A. Nykiel Idaho Conservation League PO Box 2308 102 S. Euclid #207 Sandpoint, ID 83864 mnykiel@idahoconservation.org	 □ U.S. Mail □ Facsimile □ Overnight Mail □ Hand Delivery ⋈ Electronic Mail
AURIC LLC: Elias Bishop Auric Solar, LLC 2310 S. 1300 W. West Valley City, UT 84119 elias.bishop@auricsolar.com	 □ U.S. Mail □ Facsimile □ Overnight Mail □ Hand Delivery ⋈ Electronic Mail
Preston N. Carter Deborah E. Nelson Givens Pursley LLC 601 W. Bannock Street Boise, ID 83702 prestoncarter@givenspursley.com den@givenspursley.com	 □ U.S. Mail □ Facsimile □ Overnight Mail □ Hand Delivery ⋈ Electronic Mail

SIERRA CLUB:

Kelsey Jae Nunez LLC Sierra Club 920 N. Clover Drive Boise, ID 83703 kelsey@kelseyjaenunez.com	☐ U.S. Mail☐ Facsimile☐ Overnight Mail☐ Hand Delivery☒ Electronic Mail
Tom Beach Cross Border Energy 2560 9th Street, Suite 213A Berkley, CA 94710 tomb@crossborderenergy.com	 □ U.S. Mail □ Facsimile □ Overnight Mail □ Hand Delivery ⋈ Electronic Mail
ELECTRONIC SERVICE ONLY: Michael Heckler michael.p.heckler@gmail.com Zack Waterman zack.waterman@sierraclub.org CITY OF BOISE CITY:	 ☐ U.S. Mail ☐ Facsimile ☐ Overnight Mail ☐ Hand Delivery ☒ Electronic Mail
Abigail R. Germaine Deputy City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. PO Box 500 Boise, ID 83701-0500 Telephone: (208) 608.7950 Facsimile: (208) 384.4454 agermaine@cityofboise.org IDAHO CLEAN ENERGY ASSOCIATION:	 □ U.S. Mail □ Facsimile □ Overnight Mail □ Hand Delivery ⋈ Electronic Mail
Preston N. Carter Deborah E. Nelson 601 W. Bannock Street PO Box 2720 Boise, ID 83701 prestoncarter@givenspursley.com den@givenspursley.com	 □ U.S. Mail □ Facsimile □ Overnight Mail □ Hand Delivery ⋈ Electronic Mail

VOTE SOLAR: ☐ U.S. Mail David Bender ☐ Facsimile Earthjustice ☐ Overnight Mail 3916 Nakoma Road ☐ Hand Delivery Madison, WI 53711 ⊠ Electronic Mail dbender@earthjustice.org Briana Kober ☐ U.S. Mail Vote Solar ☐ Facsimile 360 22nd Street, Suite 730 ☐ Overnight Mail Oakland, CA 94612 ☐ Hand Delivery briana@votesolar.org INTERMOUNTAIN WIND AND SOLAR, LLC: ☐ U.S. Mail Ryan B. Frazier ☐ Facsimile Brian W. Burnett ☐ Overnight Mail Kirton McConkie ☐ Hand Delivery 50 East Temple, Suite 400 PO Box 45120 Salt Lake City, UT 84111 rfrazier@kmclaw.com bburnett@kmclaw.com ☐ U.S. Mail Intermountain Wind and Solar, LLC ☐ Facsimile 1952 West 2425 South Woods Cross, UTG 84087 ☐ Overnight Mail doug@imwindandsolar.com ☐ Hand Delivery

John R. Hammond, Jr.

EXHIBIT A

Attorney Fees

(attached)

Fisher Pusch LLP 101 S. Capitol Blvd., Suite 701 P.O. Box 1308 Boise, ID 83701

Invoice submitted to: Snake River Alliance

March 22, 2018

In Reference To: Idaho Power IPC-E-17-13

Professional Services

	Hrs/Rate	Amount
9/7/2017 Draft and file Petition to Intervene in Case No. IPC-E-17-13.	1.00 200.00/hr	200.00
9/19/2017 Meeting with parties regarding the case.	1.00 200.00/hr	200.00
9/20/2017 Attend scheduling conference at PUC.	1.50 200.00/hr	300.00
9/21/2017 Review and revise proposed blog post.	0.30 200.00/hr	60.00
9/22/2017 Review IPUC 1st production request.	0.40 200.00/hr	80.00
9/28/2017 Review protective agreement terms and submit to PUC.	0.50 200.00/hr	100.00
10/5/2017 Call with client regarding case.	0.40 200.00/hr	NO CHARGE
10/18/2017 Review Idaho Power response to Vote Solar requests.	1.00 200.00/hr	200.00
10/23/2017 Conference call with parties.	0.40 200.00/hr	80.00
10/24/2017 Review Idaho Power response to discovery request of Vote Solar.	0.30 200.00/hr	NO CHARGE

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		Hrs/Rate	Amount
10/25/2017	Review draft motions to dismiss. Review correspondence surrounding motions.	1.00 200.00/hr	200.00
10/26/2017	Review correspondence of parties weighing in on whether to file or join in dispositive motions.	0.50 200.00/hr	100.00
10/27/2017	Conference call with parties regarding dispositive motions.	0.50 200.00/hr	100.00
10/31/2017	Review discovery responses of Idaho Power sent out to date. Review client comments on draft dispositive motions from other parties.	0.30 200.00/hr	NO CHARGE
11/1/2017	Drafting of Joinder and Memorandum in Support of ICFA Motion to Dismiss.	1.00 200.00/hr	200.00
11/2/2017	Continue drafting of Joinder and Memorandum.	1.50 200.00/hr	300.00
11/3/2017	Continue drafting of Joinder and Memorandum. Review Joinder of Sierra Club.	1.50 200.00/hr	300.00
11/8/2017	Review Auric information on staff position.	0.40 200.00/hr	NO CHARGE
11/9/2017	Conference call with parties.	0.50 200.00/hr	NO CHARGE
11/14/2017	Review Idaho Power response. Correspondence with clients regarding Idaho Power's response. Correspondence with clients as to when Commission may take up motions.	1.30 200.00/hr	260.00
11/17/2017	Review Auric's reply to Idaho Power response. Draft correspondence and send discovery discs to client.	0.50 200.00/hr	NO CHARGE
	Call with Preston Carter regarding Idaho Power response. Call with Sean Costello of PUC regarding the same. Review discovery responses.	1.20 200.00/hr	240.00
11/20/2017	Review correspondence from clients in Idaho Power positions. Respond. Review Idaho power discover responses.	0.50 200.00/hr	NO CHARGE
11/21/2017	Review Diego's notes on testimony outline. Review and comment on outline.	1.00 200.00/hr	200.00
11/29/2017	Review proposed testimony outline.	1.00 200.00/hr	200.00
12/4/2017	Attend PUC decision meeting on motion to dismiss.	1.00 200.00/hr	200.00

	Hrs/Rate	Amount
12/14/2017 Revise testimony. Forward to Amanda for review.	0.40 200.00/hr	NO CHARGE
12/19/2017 Revising proposed testimony.	0.50 200.00/hr	NO CHARGE
12/21/2017 Revisions to proposed testimony. Review Vote Solar's outline.	1.10 200.00/hr	220.00
12/22/2017 Finalize testimony of Amanda Levin and file same.	1.00 200.00/hr	200.00
Review testimony filed by other parties.	1.00 200.00/hr	NO CHARGE
12/26/2017 Review staff testimony.	1.00 200.00/hr	200.00
1/3/2018 Conference call with parties.	0.50 200.00/hr	100.00
1/16/2018 Participate in parties' conference call.	0.50 200.00/hr	100.00
1/17/2018 Review discovery responses of the parties.	2.00 200.00/hr	400.00
1/26/2018 Review and revise rebuttal testimony.	1.00 200.00/hr	200.00
2/12/2018 Meet with other intervening parties' counsel to discuss case.	1.00 200.00/hr	200.00
2/22/2018 Conference call with clients.	0.50 200.00/hr	100.00
2/23/2018 Meet with intervenor attorneys to discuss case strategy and issues each party wishes to explore.	2.00 200.00/hr	400.00
2/28/2018 Cross examination strategy meeting with attorneys.	1.10 200.00/hr	220.00
3/1/2018 Review testimony of all parties.	1.00 200.00/hr	200.00
Continue review of testimony of all parties.	2.00 200.00/hr	NO CHARGE
3/2/2018 Review all discovery responses.	1.00 200.00/hr	200.00

	Hrs/Rate	Amount
3/2/2018 Continue review of all discovery responses.	3.00 200.00/hr	NO CHARGE
3/5/2018 Attend public hearing.	1.00 200.00/hr	200.00
3/8/2018 Participate and represent client in technical hearing.	5.20 200.00/hr	1,040.00
Participate and represent client in technical hearing.	0.30 200.00/hr	NO CHARGE
3/9/2018 Participate in technical hearing.	3.50 200.00/hr	NO CHARGE
For professional services rendered	51.10	\$7,500.00
For professional services rendered	51.10	\$7,500.00