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 IDAHO PUBLIC UTILITIES COMMISSION

Attorneys for Idaho Clean Energy Association

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION
 OF IDAHO POWER COMPANY TO
 STUDY COSTS, BENEFITS, AND
 COMPENSATION OF NET EXCESS
 ENERGY SUPPLIED BY CUSTOMER
 ON-SITE GENERATION

Case No. IPC-E-18-15

AFFIDAVIT OF PRESTON N. CARTER IN
 SUPPORT OF IDAHO CLEAN ENERGY
 ASSOCIATION, INC.'S REQUEST FOR
 INTERVENOR FUNDING

STATE OF IDAHO)
) ss.
 County of Ada)

Preston N. Carter, being first duly sworn on oath deposes and states as follows:

1. I am the attorney for the Idaho Clean Energy Association, Inc. ("ICEA") in the this proceeding, and I make this Affidavit based on my own knowledge.
2. I have been licensed to practice law continuously in Idaho since 2010. My practice is in the area of administrative and regulatory law. For the purpose of this case I have charged a rate of \$240, which is a significant discount from my standard hourly rate, taking into account ICEA's limited financial resources and the public interest nature of the representation.
3. This case involved a significant commitment of time and resources from ICEA. It involved numerous complex issues, eight settlement conferences, and was related to two other concurrent proceedings, IPC-E-18-16 and IPC-E-19-15. Rocky Mountain Power also initiated a


ORIGINAL

case involving on-site generation that is ongoing, PAC-E-19-08. In light of the significant commitment of time required by this case, I have written off significant amounts of time, and have performed work at no charge, as required in my judgment to fulfill my duties of professional representation while taking into account ICEA's limited financial resources.

4. Givens Pursley worked closely with ICEA to limit the fees incurred in this matter. ICEA is seeking recovery of fees from Givens Pursley in the amount of \$22,776. Again, this amount reflects significant time written off and performed at no charge in light of ICEA's limited financial resources. In my opinion, a budget of two or three times this amount would have been reasonable for the case.

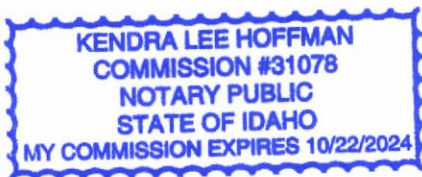
5. Exhibit 1 contains an itemized schedule of time spent and legal fees incurred in representing ICEA in this matter for which ICEA seeks recovery of intervenor funding. The time and fees were reasonably incurred given the complexity of the issues involved in this matter.


DATED: November 27, 2019.



Preston N. Carter

SUBSCRIBED AND SWORN to before me this 27th day of November, 2019.





Notary Public of Idaho
Residing at: Boise, Idaho
My Commission Expires: 10/22/24

CERTIFICATE OF SERVICE

I certify that on November 27, 2019, a true and correct copy of the foregoing comments were served upon all parties of record in this proceeding via the manner indicated below:

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Preston N. Carter

EXHIBIT 1

EXHIBIT 1

Idaho Clean Energy Association Inc. / ICEA - PUC (IPC-E-18-15)

| Date | Attorney | Hours | Amount | Rate | Narrative |
|-------------|-----------------|--------------|---------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12/14/2018 | PNC | 1.4 | \$ 336 | 240.00 | Review discovery responses and briefly review summaries of preliminary cost of service study and value of distributed energy study; email clients re: same. |
| 12/18/2018 | PNC | 4.3 | \$ 1,032 | 240.00 | Review materials and notes in preparation for PUC meeting; attend PUC meeting; follow-up after meeting. |
| 12/28/2018 | PNC | 1.4 | \$ 336 | 240.00 | Review proposed study issues; background research on issues; correspondence with client; draft proposed study topics; email client re: same. |
| 01/02/2019 | PNC | 0.7 | \$ 168 | 240.00 | Consolidate client comments into chart to send to PUC staff; revisions and correspondence to staff. |
| 01/03/2019 | PNC | 0.2 | \$ 48 | 240.00 | Review issues list submitted by other parties to prepare for meeting. |
| 01/08/2019 | PNC | 0.9 | \$ 216 | 240.00 | Review Staff's consolidation of study issues; correspondence and strategy with clients. |
| 01/09/2019 | PNC | 5.8 | \$ 1,392 | 240.00 | Prepare for PUC meeting; attend PUC meeting; follow-up with clients. |
| 01/28/2019 | PNC | 7.4 | \$ 1,776 | 240.00 | Preparatory phone call; attend PUC meeting. |
| 02/11/2019 | PNC | 0.5 | \$ 120 | 240.00 | Review proposed report and chart; comment on same. |
| 02/25/2019 | PNC | 0.3 | \$ 72 | 240.00 | Review agenda and matrix for settlement meeting. |
| 02/26/2019 | PNC | 8.9 | \$ 2,136 | 240.00 | Review agenda and materials for settlement; attend settlement; follow-up. |
| 03/29/2019 | PNC | 1.3 | \$ 312 | 240.00 | Review materials to prepare for meeting; meet with client to discuss dockets. |
| 04/10/2019 | PNC | 5.6 | \$ 1,344 | 240.00 | Conference with client before settlement meeting; attend settlement meeting; conference with client afterwards to discuss next steps. |
| 06/17/2019 | PNC | 7.5 | \$ 1,800 | 240.00 | Prepare for and attend settlement meeting. |
| 06/18/2019 | PNC | 4.3 | \$ 1,032 | 240.00 | Attend settlement meeting. |
| 06/24/2019 | PNC | 0.6 | \$ 144 | 240.00 | Telephone call with client to discuss proposals. |
| 07/09/2019 | PNC | 7.6 | \$ 1,824 | 240.00 | Prepare for and attend PUC settlement meeting; follow up with client. |
| 07/15/2019 | PNC | 1.2 | \$ 288 | 240.00 | Phone call to discuss proposals. |
| 07/16/2019 | PNC | 2.7 | \$ 648 | 240.00 | Meetings to discuss proposals. |
| 07/17/2019 | PNC | 0.5 | \$ 120 | 240.00 | Call to discuss settlement. |
| 07/24/2019 | PNC | 0.7 | \$ 168 | 240.00 | Review and revise proposals. |
| 7/31/2019 | PNC | 6.4 | \$ 1,536 | 240.00 | Prepare for and attend settlement conference; follow-up with clients. |
| 08/06/2019 | PNC | 0.7 | \$ 168 | 240.00 | Call to discuss proposals. |
| 08/20/2019 | PNC | 0.5 | \$ 120 | 240.00 | Draft and revise proposals. |
| 09/04/2019 | PNC | 5.5 | \$ 1,320 | 240.00 | Prepare for and attend settlement conference; follow-up with clients. |
| 10/09/2019 | PNC | 1.8 | \$ 432 | 240.00 | Correspondence and call re: proposals. |
| 10/10/2019 | PNC | 0.6 | \$ 144 | 240.00 | Correspondence with parties re: final settlement; correspondence with internal team re: same. |
| 10/30/2019 | PNC | 0.3 | \$ 72 | 240.00 | Draft proposed comments to support settlement agreement. |
| 11/01/2019 | PNC | 1.0 | \$ 240 | 240 | Call to discuss briefing. |
| 11/05/2019 | PNC | 0.8 | \$ 192 | 240 | Meet with client to discuss contents of affidavit. |

| Date | Attorney | Hours | Amount | Rate | Narrative |
|------------|----------|--------------|------------------|------|-----------------------------------------------------------------------------------------------|
| 11/06/2019 | PNC | 2.4 | \$ 576 | 240 | Draft affidavit of K. King; begin draft of brief to support treatment of existing customers. |
| 11/07/2019 | PNC | 2.2 | \$ 528 | 240 | Continue drafting briefs. |
| 11/08/2019 | PNC | 2.4 | \$ 576 | 240 | Revise brief; call to discuss |
| 11/11/2019 | PNC | 2.0 | \$ 480 | 240 | Complete draft brief re: existing customers. |
| 11/12/2019 | PNC | 0.7 | \$ 168 | 240 | Call to discuss briefing on existing customers; finalize affidavit and brief. |
| 11/19/2019 | PNC | 1.1 | \$ 264 | 240 | Begin draft of reply comments and petition for intervenor funding. |
| 11/20/2019 | PNC | 2.1 | \$ 504 | 240 | Draft response brief; draft petition for intervenor funding and related supporting materials. |
| 11/21/2019 | PNC | 0.6 | \$ 144 | 240 | Revise response brief re: treatment of existing customers. |
| | | Hours | Fees | | |
| | | 94.9 | \$ 22,776 | | |