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Attorney for Intervenor Idaho Irrigation Pumpers Association, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION
OF IDAHO POWER COMPANY FOR
AUTHORITY TO INCREASE ITS RATES
AND CHARGES FOR ELECTRIC
SERVICE IN THE STATE OF IDAHO AND
FOR ASSOCIATED REGULATORY
ACCOUNT TREATMENT**

CASE NO. IPC-E-23-11

**APPLICATION FOR INTERVENOR
FUNDING OF THE IDAHO
IRRIGATION PUMPERS
ASSOCIATION, INC.**

COMES NOW the Idaho Irrigation Pumpers Association, Inc. (“IIPA”), by and through counsel of record, Echo Hawk & Olsen, PLLC, 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 this case, as follows:

(A) A summary of the expenses that the IIPA request to recover broken down into legal fees, witness fees and other costs and expenses is set forth in Exhibit A attached hereto and incorporated by reference.

(B) The IIPA’s Counsel, Eric L. Olsen of Echo Hawk & Olsen (“Mr. Olsen”) and its witness Lance D. Kaufman, Ph.D. (“Mr. Kaufman”) participated in these proceedings. Mr. Olsen and Mr. Kaufman prepared and served written discovery, reviewed and analyzed the various parties’ positions, and attended and participated in person and via video conference in the various

technical conferences and settlement conferences held on September 18th, October 4th, and October 5th, 2023 (“Settlement Conferences”).

Mr. Kaufman’s review efforts focused on cost of capital, rate base, expenses, load forecast, irrigation peak reward program, net power supply costs, cost of service, rate spread, and rate design. During the Settlement Conferences all issues considered by IIPA, with the exception of net power supply costs, were raised and discussed by the parties, including Idaho Power Company (“IPC”). IPC offered reasonable responses to many of the issues and concerns raised by parties. Between settlement discussions, IIPA met with members and other intervening parties to discuss issues in the case. IIPA proposed many of the compromises that led to the Stipulation and Settlement and associated Motion filed with the Commission on October 27, 2023 (the “Proposed Settlement”). The IIPA’s proposed findings and recommendations are captured in the Proposed Settlement. As a signatory, the IIPA believes that the Proposed Settlement and the resulting proposed revenue requirement and new rates are a fair, just and reasonable resolution to the issues addressed therein.

(C) The expenses and costs incurred by the IIPA set forth in Exhibit A are reasonable in amount and were necessarily incurred. The expenses and costs were incurred in participating in the technical and settlement conferences, in the drafting and review discovery responses, and negotiating the final terms of the Proposed Settlement. Without incurring these expenses and costs, IIPA would not have been able to fully participate in this matter.

(D) The costs described in Exhibit A constitute a financial hardship for the IIPA. The IIPA is 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 IIPA relies solely upon dues and contributions voluntarily paid by members, together with intervenor

funding, to support its activities. Each year mailings are sent to approximately 7,000 Idaho Irrigators (approximately one-third in the IPC service area and the remainder in IPC's service area), soliciting annual dues. IIPA recommends members make voluntary contributions based on acres irrigated or horsepower per pump. Member contributions have been falling which is believed to be attributable to increased operating costs and declining commodity prices.

From member contributions the IIPA must pay all expenses, which generally include mailing expenses, meeting expenses, post office box, in addition to the expenses relating to participation in matters before the Commission. The Executive Director, Amy McKoon, is the only part-time paid contractor, receiving a retainer plus expenses for office space, office equipment, and secretarial services. Other IIPA officers and directors are elected annually and serve without compensation.

It has been and continues to be a financial hardship for the IIPA to fully participate in important cases such as this one due to the time and expense that must be incurred to fully participate in such a case. Because of the IIPA's financial constraints, participation in this case, preparing to file testimony, and participating in the settlement negotiations has been focused and prudent.

(E) IIPA proposed many of the compromises that led to the rate spread and rate design contained in the Proposed Settlement. As such, the issues that the IIPA raised and urged to be adopted by in the settlement discussions materially differed from those addressed by the Commission Staff and other parties.

(F) The IIPA's participation addressed issues of concern to the general body of users or consumers on IPC's system in that the Irrigator adjustments adopted in the Stipulation reduced the proposed rate increase for the majority of customer classes.

(G) The IIPA represents the irrigation class of customers under Schedule 10 on IPC's system.

Based on the foregoing, it is respectfully submitted that the IIPA's are a qualifying intervenor and should be entitled to an award of costs of intervention in the maximum amount allowable pursuant to Idaho Code § 61-617A and IDAPA §§ 31.01.01.161 through .165.

DATED this 12th day of December, 2023.

ECHO HAWK & OLSEN



ERIC L. OLSEN

CERTIFICATE OF SERVICE

I HEREBY CERTIFIY that on this 12th day of December, 2023, I served a true, correct and complete copy of the Petition of Idaho Irrigation Pumpers Association, Inc. for Leave to Intervene to each of the following, via U.S. Mail or private courier, email or hand delivery, as indicated below:

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ERIC L. OLSEN

EXHIBIT A

Expert Witness, Lance Kaufman, Expenses:

1. Witness Fees: 72.69 Hours @ \$250 = \$18,172.50

Legal Expenses:

1. Paralegal Fees: 6.1 Hours @ \$90 = \$ 549.00

2. Legal Fees Eric L. Olsen: 67.4 Hours @ \$250 = \$16,850.00

3. Soft Costs (Copies/Postage/Hotel) \$ 509.51

Sub Total: \$17,908.51

Grand Total: \$36,081.01