

1. Itemized list of expenses

NWEC incurred compensable costs and expenses in this procedure. Idaho Code empowers the Commission to award “legal fees, witness fees, and reproduction costs.” I.C. § 61-617A. The attached Exhibit A is an itemized list of expenses incurred by NWEC in this proceeding. Expenses include time by F. Diego Rivas, attorney for NWEC. Broadly, NWEC reviewed the Company’s application, petitioned for and were granted intervention, reviewed relevant discovery, participated in settlement negotiations, and prepared a letter in support of the proposed settlement before the Commission. A more detailed account of expenses, time, and hourly rates is included in Exhibit A. IDAPA 31.01.01-162.01. NWEC seek recovery of these legal fees. In all these efforts NWEC focused on a limited number of issues relevant to our interests and aimed to use our time and the time of other parties efficiently. IDAPA 31.01.01-162.01.

2. Statement of Proposed Findings

NWEC is a party to the Stipulation and Settlement put forth before the Commission and recommends the Commission approve the Settlement in its entirety. Throughout the proceeding, NWEC maintained that the basic charge should be set at a level necessary to recover only the marginal cost of adding a new customer to the grid. Setting the basic charge higher than the costs of customer service, metering, and billing send a negative price signal for customers to invest in energy efficiency and disproportionately hurts low-income and low-usage customers. As such, NWEC opposed IPC’s initial proposal to increase the basic charge to \$35/month. Similarly, NWEC opposed IPC’s proposal to flatten the existing block rates. The Settlement presents a reasonable compromise of these issues, and thus the Commission should find the Settlement to be just and reasonable.

3. Statement Showing Costs

NWEC requests \$2,325 in intervenor funding. Exhibit A offers a detailed account of expenses. The hourly rates and time spent by NWEC's staff attorney, F. Diego Rivas, is reasonable for a complex utility rate case. Rivas has a combined 14 years of direct policy experience and as counsel practicing before Public Utility Commissions in Idaho, Montana, and Oregon. The hourly rate of \$150 is consistent with his experience and local markets.

4. Explanation of Costs Statement

The recovery of costs in this matter supports the work of NWEC in pursuing energy policy in the public interest. NWEC represents over 100 member organizations in the Northwest, including eleven in Idaho, to pursue sustainable and equitable energy policy. NWEC staff are considered an experts in rate design, providing testimony on rate design issue in Idaho, Montana, Washington, and Oregon.

NWEC is funded through membership dues and individual donations. While NWEC budgets prudently for programmatic efforts, this complex matter demanded considerable time and attention for key staff to provide "full and fair representation" before the Commission as stated in I.C. § 61-617A.

5. Explanation of Differences

Until final settlement, NWEC's position on rate design materially differed from that of Idaho Power and Commission Staff. Idaho Power initially proposed a modernization plan that would see the basic charge rise to \$35/month over the next five years. Through its own analysis,

NWEC provided the baseline figure for parties supporting a lower basic charge. NWEC continues to believe that, based on costs provided by the Company, a reasonable basic charge that covers the cost of providing customer service, metering, and billing is lower than the settled upon terms. The independently determined figure was relied upon by other parties in settlement negotiations which ultimately saw parties agree to raising the residential basic charge to \$10/month in rate year 1 and \$15/month in rate year 2 of the two-year rate plan. NWEC continues to believe that rate design generally should encourage the efficient use of electricity and allow customers to control their utility bills through low basic charges and corresponding volumetric charges.

NWEC also opposed Idaho Power's request to eliminate inclining block rates, and suggested that Idaho Power better utilize time-of-use rates as a means to ensure the efficient use of energy at times of low overall demand.

6. Statement of Recommendation

NWEC recommends the Commission approve the all-party, all-issue settlement and provide recovery of reasonable intervention costs for parties in this case.

7. Statement Showing Customer Class

NWEC's members are also members of Idaho Power's residential and small commercial classes.

Conclusion

In sum, for the foregoing reasons, NWECC respectfully requests the Commission grant this Petition for Intervenor Funding in the amount of \$2,325.00.

Respectfully submitted this 12th day of December 2023.



F. Diego Rivas (appearing *pro hac vice*)
Regulatory Counsel
NW Energy Coalition
1101 8th Ave
Helena, MT 59601
(406) 461-6632

Exhibit A – NWECC Statement of Costs Incurred

Name	Task	Description	Time (Hrs)	Rate (\$/hr)	Sum (\$)
Rivas	Application Review	Read application and relevant testimonies, identify issues of interest, attend parties meeting	4	150	600
Rivas	Intervention	Draft and submit intervention and pro hac petitions	0.5	150	75
Rivas	Settlement Conferences	Prepare for and attend settlement discussions	9.2	150	1380
Rivas	Testimony Review	Review settlement and testimonies	1.5	150	225
Rivas	Hearing	Remote listening of technical hearing	0.3	150	45

For Professional Services Rendered

(\$): \$2,325.00

Direct Costs (\$): \$0.00

Total Intervenor Funding

Requested: \$2,325.00

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of December, 2023, I delivered true and correct copies of the foregoing Petition for Intervenor Funding to the following persons via the method of service noted:

/s/ F. Diego Rivas
Regulatory Counsel
NW Energy Coalition
1101 8th Ave
Helena, MT 59601
diego@nwenergy.org

Electronic Mail Only (See Order No. 35058):

Idaho Public Utilities Commission

Jan Noriyuki
Commission Secretary
jan.noriyuki@puc.idaho.gov
secretary@puc.idaho.gov

Commission Staff

Chris Burdin
Deputy Attorney General
Idaho Public Utilities Commission
Chris.Burdin@puc.idaho.gov

Idaho Power Company

Lisa Nordstrom
Megan Goicoechea Allen
Donovan E. Walker
1221 W. Idaho St.
P.O. Box 70
Boise, ID 83707-0070
lnordstrom@idahopower.com
mgoicoecheaallen@idahopower.com
dwalker@idahopower.com
dockets@idahopower.com

Timothy Tatum
Connie Aschenbrenner
Matt Larkin
ttatum@idahopower.com
caschenbrenner@idahopower.com
mlarkin@idahopower.com

Clean Energy Opportunities for Idaho

Kelsey Jae
Law for Conscious Leadership
920 N. Clover Dr.
Boise , ID 83703
kelsey@kelseyjae.com

Mike Heckler
Courtney White
3778 Plantation River Dr., Ste. 102
Boise, Idaho 83703
mike@cleanenergyopportunities.com
courtney@cleanenergyopportunities.com

IIPA

Erik L. Olsen
Echo Hawk & Olsen, PLLC
P.O. Box 6119
Pocatello, ID 83205
elo@echohawk.com

Lance Kaufman, Ph.D
2623 NW Bluebell Place
Corvallis, OR 97330
lance@aegisinsight.com

ICIP

Peter J. Richardson
Richardson Adams, PLLC
515 N. 27th St.
Boise, ID 83702
peter@richardsonadams.com

Dr. Don Reading
280 Silverwood Way
Eagle, ID 83616
dreading@mindspring.com

Micron Technology, Inc.

Jim Swier
Micron Technology, Inc.
8000 South Federal Way
Boise, ID 83707
jswier@micron.com

Austin Reuschhoff
Thorvald Nelson
Austin W. Jensen
Holland & Hart, LLP
555 17th Street Suite 3200
Denver, CO 80202
darueschhoff@hollandhart.com
tnelson@hollandhart.com
awjensen@hollandhart.com
aclee@hollandhart.com
clmoser@hollandhart.com