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July 9, 2015

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
P.O. Box 83720
472 W. Washington Street
Boise, ID 83720-0074

RECEIVED
2015 JUL 10 AM 9:52
IDAHO PUBLIC
UTILITIES COMMISSION

**Re: Filing of Application for Intervenor Funding of the Idaho Irrigation Pumpers Association, Inc.
Case Nos. IPC-E-15-01, AVU-E-15-01, PAC-E-15-03, Consolidated**

Dear Commission Secretary Jewell:

Enclosed for filing in the above-referenced matter please find the original and eight (8) copies of the Application for Intervenor Funding of The Idaho Irrigation Pumpers Association, Inc. Please file the Application accordingly and return a conformed copy to us in the enclosed envelope.

Thank you for your kind assistance. Please contact me if you have any questions.

Sincerely,



Monica Sanada
Paralegal

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RECEIVED
2015 JUL 10 AM 9:51
IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Intervenor
Idaho Irrigation Pumpers Association, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S PETITION TO MODIFY) CASE NO. IPC-E-15-01
TERMS AND CONDITIONS OF PURPA)
PURCHASE AGREEMENTS)
)

IN THE MATTER OF AVISTA)
CORPORATION'S PETITION TO MODIFY) CASE NO. AVU-E-15-01
TERMS AND CONDITIONS OF PURPA)
PURCHASE AGREEMENTS)
)

IN THE MATTER OF ROCKY MOUNTAIN)
POWER COMPANY'S PETITION TO) CASE NO. PAC-E-15-03
MODIFY TERMS AND CONDITIONS OF)
PURPA PURCHASE AGREEMENTS)
)

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

COMES NOW the Idaho Irrigation Pumpers Association, Inc. (Irrigators"), by and through counsel of record, Eric L. Olsen, 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 consolidated case, as follows:

(A) A summary of the expenses that the Irrigators request to recover broken down into legal fees, consultant fees and other costs and expenses is set forth in Exhibit "A" attached

hereto and incorporated by reference. Itemized statements are also included as Attachments 1 and 2 to Exhibit "A" in support of said summary and are incorporated by reference

(B) The Irrigators' Legal Counsel, Eric L. Olsen, and its consultant, Anthony J. Yankel, P.E., fully participated in these proceedings. Procedurally, this case was completed on an accelerated basis, with direct and rebuttal testimony being filed and all parties preparing for and attending the technical hearings held on June 29 through June 30, 2015.

Irrigators' Consultant, Anthony J. Yankel testified in support of Idaho Power Company's ("IPC") Petition. Mr. Yankel's testimony showed how the current assumptions built into IPC's avoided cost methodology are inconsistent with the manner in which IPC's supply side resources are actually utilized, while at the same time IPC is making sales-for-resale at substantially lower prices than the avoided cost rates. Mr. Yankel further recommended that the Commission open up a new docket to refine the avoided cost methodology that takes in the account IPC's actual operating conditions.

The Irrigators' Legal Counsel, Eric L. Olsen, also participated in the technical hearings and cross examined Staff and Intervenor witnesses.

(C) The expenses and costs incurred by the Irrigators set forth in Exhibit A and accompanying attachments are reasonable in amount and were necessarily incurred. The expenses and costs were incurred in reviewing the Irrigators' data requests and responses, drafting and filing direct testimony, preparing cross examination questions for various witnesses, and participating in technical hearings held by the Commission. Without incurring these expenses and costs, the Irrigators would not have been able to fully participate in this matter.

(D) The costs described in Paragraph (A) above constitute a financial hardship for the Irrigators. The Irrigators are 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 Irrigators rely solely upon dues and contributions voluntarily paid by members, together with intervenor funding, to support activities. Each year mailings are sent to approximately 7000 Idaho Irrigators (approximately two-thirds in the Idaho Power Company service area and one-third in the RMP service area), soliciting annual dues. The Irrigators recommend members make voluntary contributions based on acres irrigated or horsepower per pump. Member contributions have been falling which is believed to be attributable to the effects of the great recession and increased operating costs and threats, particularly those relating to water right protection issues.

From member contributions the Irrigators must pay all expenses, which generally included mailing expenses, meeting expenses and shared office space in Boise, Idaho, in addition to the expenses relating to participation in matters before the Commission. The Executive Director, Lynn Tominaga, is the only part-time paid contractor, receiving a retainer plus expenses for office space, office equipment, and secretarial services. Officers and directors are elected annually and serve without compensation.

It has been and continues to be a financial hardship for the Irrigators to fully participate in important cases such as this one due to the time and expense that has to be incurred to fully participate in such a case. As a result of the Irrigators' financial constraints, participation in this case, and filing of testimony and cross-examination of witnesses has been selective.

(E) The Irrigators' positions urged to be adopted by the Commission materially differed from those addressed by the Commission Staff and other parties. The Irrigators showed that the way in which IPC was operating its system was not consistent with the assumptions contained in the avoided cost model. This testimony supports the Commission shortening the

contract term as urged by IPC and Commission staff and supports the Irrigators' proposal to further refine the avoided cost methodology.

(F) The Irrigators' participation addressed issues of concern to the general body of users or consumers on IPC's system and Rocky Mountain Powers' ("RMP") system. If IPC or RMP have to purchase power that is not needed, all customers' rates will go up and such rates arguably would not be just and reasonable.

(G) The Irrigators represent the irrigation class of customers under Schedule 24 on IPC's system and Schedule 10 on RMP's system. \

Based on the foregoing, it is respectfully submitted that the Irrigators 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 9th day of July, 2015.

ECHO HAWK & OLSEN, PLLC

By: 

ERIC L. OLSEN Attorney for
Idaho Irrigation Pumpers Association, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of July, 2015, I caused to be served a true, correct, and complete copy of the foregoing document by the method indicated below, and addressed to the following:

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ERIC L. OLSEN

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EXHIBIT A

SUMMAPRY OF EXPENSES INCURRED BY IRRAGATORS

1. Legal Fees:

Eric L. Olsen (Partner) 37.5hrs @ \$200/hour \$ 7,500.00

Costs:

Travel/Mileage: \$ 250.00

Lodging & Meals \$ 206.43

Total Legal Fees and Costs: \$ 7,956.43

2. Consultant Anthony J. Yankel:

Consultant Fees:

163 hours @ \$150/hour \$24,450.00

Expenses:

Travel, Lodging, Meals: \$ 1,327.29

Total Consultant Fees and Costs: \$25,777.29

TOTAL FEES AND COSTS

\$33,733.72

ATTACHMENT 1

Trans Date	Atty	Rate	Hours to Bill	Amount	
02/09/2015	ELO	200	0.4	80	REVIEW NOTICE OF PURPA CASE; TELEPHONE CONFERENCE WITH TONY YANKEL REGARDING SAME
02/10/2015	ELO	200	0.1	20	CALL AND LEAVE MESSAGE WITH LYNN TOMINAGA
02/13/2015	ELO	200	0.4	80	TELEPHONE CONFERENCE WITH LYNN TOMINAGA REGARDING INTERVENTION IN PURPA CASE
02/17/2015	ELO	200	0.7	140	SEE THAT PETITION TO INTERVENE IS PREPARED AND SEE THAT DATA REQUESTS ARE PREPARED
02/18/2015	ELO	200	0.5	100	REVIEW AND REVISE PETITION TO INTERVENE AND FIRST DATA REQUESTS; REVIEW FILED DOCUMENTS
02/23/2015	ELO	200	0.4	80	REVIEW PROTECTIVE AGREEMENT AND SIGN AND E-MAIL SIGNATURE PAGE AND EXHIBIT A; CALL AND LEAVE MESSAGE WITH TONY YANKEL REGARDING SIGNING EXHIBIT A
02/24/2015	ELO	200	0.1	20	CALL AND LEAVE MESSAGE WITH TONY YANKEL RE: PROTECTIVE AGREEMENT
03/10/2015	ELO	200	1.1	220	TELEPHONE CONFERENCE WITH TONY YANKEL RE: THE UPCOMING PURPA STATUS CONFERENCE; PARTICIPATE IN SCHEDULING CONFERENCE
03/13/2015	ELO	200	0.2	40	REVIEW DON HOWELL'S LETTER TO THE COMMISSION RE: THE MOTIONS TO CLARIFY; REVIEW RESPONSES TO DATA REQUESTS
03/17/2015	ELO	200	0.1	20	REVIEW COMISSION CONSOLIDATION ORDER
03/17/2015	ELO	200	0.2	40	TELEPHONE CONFERENCE WITH TONY YANKEL RE: RESULTS OF STATUS CONFERENCE AND ADDITIONAL DATA REQUESTS
03/23/2015	ELO	200	0.3	60	REVIEW SCHEDULING ORDER AND RESPONSES OF IPC AND RMP TO CLEARWATER AND SIMPLOT MOTIONS IN PREPARATION FOR ANNUAL MEETING
03/25/2015	ELO	200	0.6	120	FINALIZE SECOND DATA REQUESTS TO IPC; FINALIZE DATA REQUESTS TO ROCKY

MOUNTAIN; SEE THAT SAME ARE FILED AND SERVED ON PARTIES

04/01/2015	ELO	200	0.2	40	REVIEW DEADLINES; TELEPHONE CONFERENCE WITH TONY YANKEL RE: TIMING OF FILING TESTIMONY
04/16/2015	ELO	200	1.4	280	TELEPHONE CONFERENCE WITH TONY YANKEL REGARDING USE OF CONFIDENTIAL INFORMATION FOR TESTIMONY AND OUTSTANDING DATA REQUESTS; REVIEW PROTECTIVE AGREEMENT AND RULES OF PROCEDURE; CALL AND LEAVE MESSAGE WITH DONOVAN WALKER REGARDING USE OF CONFIDENTIAL INFORMATION; TELEPHONE CONFERENCE WITH DONAVAN WALKER REGARDING SAME
04/20/2015	ELO	200	2.5	500	TELEPHONE CONFERENCE WITH TONY YANKEL REGARDING REVIEW OF TESTIMONY; REVIEW DRAFT TESTIMONY
04/21/2015	ELO	200	2.2	440	REVISE TESTIMONY; CONFERENCE WITH YANKEL REGARDING SAME; REVIEW REVISED TESTIMONY
04/22/2015	ELO	200	3.4	680	REVIEW AND REVISE YANKEL DIRECT TESTIMONY AND PREPARE REDACTED VERSION; TELEPHONE CONFERENCE WITH YANKEL REGARDING SAME; CONFERENCE WITH TJL REGARDING SAME FILED
04/27/2015	ELO	200	0.2	40	TELEPHONE CONFERENCE WITH TONY YANKEL REGARDING REVIEW OF DIRECT TESTIMONY OF THE INTERVENORS IN PURPA CASE; SEE THAT OTHER INTERVENOR TESTIMONY IS PRINTED AND PUT IN BINDER; BEGIN REVIEWING DIRECT TESTIMONY IN PREPARATION FOR HEARING
05/27/2015	ELO	200	0.1	20	TELEPHONE CONFERENCE WITH TED WESTON RE: GETTING COPY OF CONFIDENTIAL TESTIMONY
05/28/2015	ELO	200	0.3	60	REVIEW EMAIL FROM RMP COUNSEL AND EMAIL CONFIDENTIAL PORTION OF YANKEL TESTIMONY
06/08/2015	ELO	200	2.6	520	TELEPHONE CONFERENCE WITH TONY YANKEL REGARDING: UPCOMING HEARING WHETHER HE NEEDS TO ATTEND THE HEARING; REVIEW COMMISSION RULES ON PRESENTATION OF TESTIMONY; EMAIL DONOVAN WALKER OF IPC; CALL AND LEAVE MESSAGE WITH TED WESTON; REVIEW STAFF AND INTERVENOR TESTIMONY; TELEPHONE CONFERENCE WITH TED WATSON REGARDING: PRESENTATION OF TESTIMONY; CONTINUED REVIEW OF INTERVENOR TESTIMONY

06/09/2015	ELO	200	1.5	300	CONTINUE REVIEW OF INTERVENOR TESTIMONY
06/22/2015	ELO	200	1	200	TELEPHONE CONFERENCE WITH TONY YANKEL RE: HEALTH ISSUES AND TRAVELING; TELEPHONE CONFERENCE WITH DAPHNE HUANG RE: YANKEL'S TRAVEL ISSUES; DRAFT EMAIL TO PARTIES RE: SAME AND TESTIFYING VIA CONFERENCE CALL; TELEPHONE CONFERENCE WITH DAPHNE HUANG RE: COMMISSIONER'S POSITION ON THE PRESENTING THE TESTIMONY OF TONY YANKEL; TELEPHONE CONFERENCE WITH TONY YANKEL RE: ATTENDANCE AT HEARING
06/28/2015	ELO	200	1	200	PREPARE FOR CROSS EXAMINATION OF STAFF AND INTERVENOR WITNESSES
06/29/2015	ELO	200	8.5	1700	PREPARE FOR HEARINGS; PARTICIPATE IN TECHNICAL HEARINGS AND CROSS EXAMINE WITNESSES
06/30/2015	ELO	200	4	800	PREPARE FOR AND PARTICIPATE IN TECHNICAL HEARINGS; CROSS EXAMINE WITNESSES AND MAKE CLOSING STATEMENT
7/7/2015	ELO	200	1.5	300	PREPARE APPLICATION FOR INTERVENTOR FUNDING
7/9/2015	ELO	200	2	400	FINALIZE APPLICATION FOR INTERVERNOR FUNDING
		Billable	37.5	7500	

ATTACHMENT 2

Date	IPCo filings	<u>Description</u>
Feb. 10	5	Review filing and associated exhibit from Case 15-01 regarding the request to reduce the PURPA contracts from 20 years to 2 years.
11	2	Read testimony of Company witnesses Grow and Allphin regarding case No. 15-
13	4	Discussion with Don Reading regarding what other intervenors are thinking; begin development of interrogatories.
16	2	Review materials from the last case where QF contracts were addressed--Case No. GNR-E-11-03.
17	2	Finalize first set of interrogatories.
18	2	Review treatment in past cases for QF's and follow the Commission orders regarding same.
19	4	Review treatment in past cases for QF's and follow the Commission orders regarding same; discussions with Reading regarding his and my approach to the problem of too much QF.
Mar 2	2	Review data responses to Simplot.
6	4	Review data responses to Simplot; discussion with Reading; outline additional areas for questions.
9	4	Review staff requests; review responses to Simplot.
10	2	Review information (Company testimony and data responses) to develop a general approach to the case.
13	2	Review responses to Irrigator requests; develop various scenarios of what went wrong.
23	4	Review IPCo" cogeneration tariffs; compare with what is requested in the filing.

Date	IPCo filings	Description
24	4	Review filing of IPCo as well as responses to Irrigators and Simplot; develop interrogatories.
28	2	Review recently submitted material; analyze IIPA request 10.
April 2	2	Work with hourly system data to understand what happens when IPCo must curtail generation.
7	4	Review hourly system data to view how it works compared to the modeling of avoided cost.
8	6	Review hourly system data to view how it works compared to the modeling of avoided cost.
9	6	Review hourly system data to view how it works compared to the modeling of avoided cost.
10	5	Compile data regarding when the curtailments took place and what was being generated on the system.
13	8	Develop data for curtailments and the generation resources being used on the system.
14	8	Develop data regarding the price of sales for resale and purchases vs the units operating on the system.
15	8	Develop table showing sales for resale prices vs. what units were operating on the system for June 2013.
16	8	Outline introduction to testimony; develop testimony regarding Exhibit 6 vs the information found.
17	8	Continue writing testimony; develop issues regarding sale-for-resale price and unit operation.
20	8	Draft introduction to testimony; review and edit testimony.

Date	IPCo filings	<u>Description</u>
21	7	Finalize testimony.
24	6	Review testimony of others; review data responses.
June 23	5	Review testimony of others; develop crossexamination questions.
24	4	Review testimony of others; develop crossexamination questions.
25	4	Review additional testimony of others; develop crossexamination questions.
26	2	Final review of my testimony and others; prepare information needed to take to support my testimony.
28	7	Travel to Boise; review filing and my testimony
29	5	Prepare for and attend hearing
30	7	Return home.
Total.	163	