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IDAHO PUBLIC  
UTILITIES COMMISSION

*Attorney for the Snake River Alliance*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER COMPANY'S  
PETITION TO MODIFY TERMS AND CONDITIONS  
OF PURPA PURCHASE AGREEMENTS

CASE NO. IPC-E-15-01

IN THE MATTER OF AVISTA CORPORATION'S  
PETITION TO MODIFY TERMS AND CONDITIONS  
OF PURPA PURCHASE AGREEMENTS

CASE NO. AVU-E-15-01

IN THE MATTER OF ROCKY MOUNTAIN POWER  
COMPANY'S PETITION TO MODIFY TERMS AND  
CONDITIONS OF PURPA PURCHASE AGREEMENTS

CASE NO. PAC-E-15-03

SNAKE RIVER ALLIANCE  
PETITION FOR INTERVENOR  
FUNDING

COMES NOW, the Snake River Alliance ("Alliance"), pursuant to Idaho Code § 61-617A and IDAPA 31.01.01.161-165, with this petition for intervenor funding. The Alliance is an intervenor in this case pursuant to Order No. 33222. This petition is timely pursuant to the Commission's instruction at the Technical Hearing on June 30 to submit such applications by July 10, 2015.

**I. Intervenor Funding is Appropriate in this Case.**

Intervenors may apply for funding in any case involving regulated electric utilities with gross Idaho intrastate annual revenues exceeding \$3,500,000. Idaho Code § 61-617A and IDAPA 31.01.01.161. Idaho Power Company, Rocky Mountain Power, and Avista Corporation are regulated electric public utilities and each have gross Idaho intrastate annual revenues exceeding \$3,500,000.

**II. The Alliance Meets the Standards for Granting Intervenor Funding.**

Pursuant to Rule 162, the Alliance submits the following information demonstrating qualification for intervenor funding.

**a. Itemized List of Expenses.**

The Attached Exhibit A is an itemized list of legal expenses incurred by the Alliance in this proceeding. Exhibit A indicates the time spent reviewing the three utilities' applications for relief, drafting Alliance pleadings and reviewing pleadings filed by other parties, reviewing discovery, legal research and analysis, preparing and filing the direct testimony of Ken Miller<sup>1</sup>, reviewing direct and rebuttal testimony of other parties, conferring with experts and other parties, and preparing for and participating in the prehearing conference and technical hearing.

**b. Statement of Proposed Findings.**

The Alliance proposes that the Commission maintain the 20-year contract term and supports the adoption of a change to the contracts to include an adjustment to the energy component of the rate after year 10 for the remainder of the contract term. The Alliance also asks the Commission to grant this petition for intervenor funding.

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<sup>1</sup> The Alliance is not seeking Intervenor funding for Mr. Miller's time.

**c. Statement Showing Costs.**

The Alliance's request for \$5,800 in intervenor funding, rounded down for convenience and as shown in Exhibit A, represents a reasonable hourly rate and a reasonable expenditure of hours in light of the complexity of this case and numerous parties participating. Counsel for the Alliance worked efficiently, avoided duplicating the actions of other parties, focused on issues of material concern into the case, and was an active participant in the technical hearing. The Alliance is not seeking funding for the expert witness's time or for time spent on outreach to assist with a robust public hearing and commenting process. The hourly rate requested for Counsel is in line with Order No. 32846. Thus, the request is reasonable.

**d. Explanation of Cost Statement.**

The Snake River Alliance is a small, nonprofit organization supported by charitable contributions from individuals, families, and foundations. We participated in this proceeding on behalf of our members, most of who are customers of Idaho Power, Avista Corporation, or Rocky Mountain Power. Our participation in this case was necessary to provide a voice for the position that ratepayers face significant economic and environmental risks associated with the utilities' coal fleet and that addressing those risks require ambitious pursuit of clean and renewable alternatives to coal and large hydropower. The outcome of this case will impact the growing renewable energy industry and Idaho's role in climate change mitigation, and therefore the Alliance's participation was key to ensuring the Commission was presented with necessary evidence. The Alliance has a limited budget and only 3.5 FTE staff members. The time dedicated to this case presented a significant financial commitment with respect to the work load of the Clean Energy Program Director, a regionally recognized expert in this field, and the

Executive Director, an Idaho attorney with experience in energy policy and law. Intervenor funding is essential to the Alliance's ability to participate in these important proceedings.

**e. Statement of Difference.**

The Alliance's proposed findings are materially different from the Commission Staff, who propose a 5-year contract term and assert that all long-term avoided cost forecasts are inaccurate and that fixed price contracts do not benefit customers. The Alliance supports maintaining the 20-year contract term, with adjustments as described above. Our position also materially and substantially differs from Commission Staff in that, unlike the Alliance, the Commission Staff does not consider the proposal to be out of line with the Idaho Energy Plan, nor did Staff analyze or consider the economic risks associated with the environmental harms that could result from their proposal.

**f. Statement of Recommendation.**

The Alliance's recommendation and position addressed issues of concern to the general body of utility users and consumers in the following respects: the utility companies' continued reliance on coal-fired generation poses significant economic and environmental risks to its customers and residents of the State of Idaho, and this case will impair the future of utility-scale solar power development in Idaho, and customers of each of these utilities may face increased electricity rates in the future as a result.

**g. Statement Showing Class of Customer.**

The Alliance members include residential and small commercial customers of all three Idaho investor owned utilities.

WHEREFORE, the Snake River Alliance respectfully requests the Commission grant this  
Petition for Intervenor Funding.

DATED this 10<sup>th</sup> day of July, 2015.

Respectfully submitted,

A handwritten signature in black ink that reads "Kelsey Nunez". The signature is written in a cursive style with a horizontal line underneath it.

Kelsey Jae Nunez  
Snake River Alliance

## Exhibit A

### Cost Statement for the Snake River Alliance

#### All costs for Kelsey Jae Nunez, Counsel for Snake River Alliance

Reviewing and analyzing pleadings, discovery, and testimony filed by other parties

- 6.5 hours @ \$135 = \$877.50

Drafting Petition to Intervene

- 1 hour @ \$135 = \$135.00

Legal research and analysis on PURPA

- 2.5 hours @ \$135 = \$337.50

Preparing and Filing the Direct Testimony of Ken Miller

- 14.4 hours @ \$135 = \$1,944

Preparing for and Participating in the Prehearing Conference and Technical Hearing.

- 18.7 hours @ \$135 = \$2,524.50

**Total: \$5,818.5**

**Rounded down to: \$5,800**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this July 10, 2015, I delivered true and correct copies of the PETITION TO INTERVENE on behalf of the Snake River Alliance to the following parties via the method of service noted:

Hand Delivery:

Jean Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington St.  
Boise, ID 83702-5983  
(Original and 9 copies provided)

Certificate of Service - Snake River Alliance  
IPC-E-15-01, AVU-E-15-01, PAC-E-15-03

Electronic Delivery:

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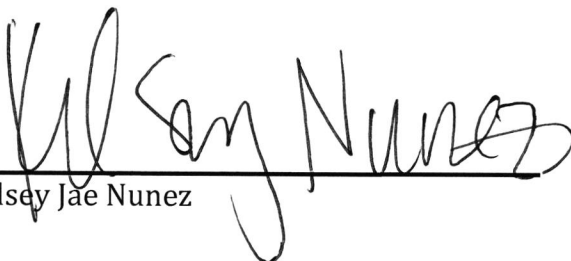
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**(Exhibit Nos. 1501-1600)**

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