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LOUIS F. RACINE (1917-2005) WILLIAM D. OLSON, OF COUNSEL

February 23, 2012

SENDER'S E-MAIL ADDRESS: elo@racinelaw.net

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission Attention: Filing Center PO Box 2148 Salem, Oregon 97308-2148

RE: Docket No. UE 233 - Motion to Admit Prior Testimony

Dear Sir or Madame:

Enclosed for electronic filing in the above-captioned docket is Oregon Irrigation Pumpers Association's Motion to Admit Prior Testimony. Attached is the signed Affidavit from Anthony J. Yankel. The affidavit for William L. Johnson will be filed separately.

ery truly yours,

ELO/dl

c: UE 233 Service List (parties) Anthony Yankel

William Johnson

Eric L. Olsen (*Pro Hac Vice*, ISB No. 4811) RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED 101 South Capitol Blvd., Suite 300 Boise, Idaho 83702

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Attorneys for Intervenor Oregon Irrigation Pumpers Association, Inc.

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

In the Matter of IDAHO POWER)	UE 233
COMPANY)	
Request for General Rate Revision)	MOTION TO ADMIT PRIOR
)	TESTIMONY
)	

The Oregon Irrigation Pumpers Association, Inc. ("OIPA") hereby moves the Administrative Law Judge to admit OIPA's Pre-Filed Testimony and Exhibits, OIPA 100-103/Yankel and OIPA 200/Johnson, into the record in the above captioned proceeding. OIPA's Testimony and Exhibits were previously filed with the Commission and are OIPA's Testimony in this docket. The affidavits of Anthony J. Yankel and William L. Johnson attesting to the truthfulness of their Testimony will be subsequently provided to support this Motion.

DATED this 23rd Day of February, 2012.

RACINE OLSON NYE BUDGE & BAILEY, CHTD.

By: /Eric L. Olsen
Eric L. Olsen
Pro Hac Vice
Attorneys of Oregon Irrigation Pumpers
Association, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 23rd day of February, 2012, I served a true and correct copy of the above and foregoing document to the following person(s) as follows:

LISA D. NORDSTROM CHRISTA BEARRY IDAHO POWER COMPANY PO BOX 70 BOISE, IDAHO 83707-0070 Inordstrom@idahopower.com cbearry@idahopower.com	[x]	U. S. Mail Postage Prepaid Hand Delivery Electronic Mail Facsimile
LISA F. RACKNER MCDOWELL RACKNER & GIBSON PC 419 SW 11 TH AVE., SUITE 400 PORTLAND, OR 97205 lisa@mcd-law.com	[x]	U. S. Mail Postage Prepaid Hand Delivery Electronic Mail Facsimile
STEPHANIE S. ANDRUS ASSISTANT ATTORNEY GENERAL PUC STAFF-DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM, OR 97301-4096 stephanie.andrus@state.or.us	[] [x] []	Electronic Mail
GORDON FEIGHNER ROBERT JENKS G. CATRIONA MCCRACKEN CITIZEN'S UTILITY BOARD OF OREGON 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 gordon@oregoncub.org bob@oregoncub.org catriona@oregoncub.org		U. S. Mail Postage Prepaid Hand Delivery Electronic Mail Facsimile
JUDY JOHNSON CARLA BIRD	[]	U. S. Mail Postage Prepaid

MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS OF OREGON IRRIGATION PUMPERS ASSN. DOCKET NO. UE 233 - Page 3 $\,$

PUBLIC UTILITY COMMISSION OF OREGON PO BOX 2148 SALEM, OR 97308-2148 judy.johnson@state.or.us carla.bird@state.or.us	[] [x] []	Hand Delivery Electronic Mail Facsimile
GREGORY M. ADAMS PETER J. RICHARDSON RICHARDSON & O'LEARY PLLC PO BOX 7218 BOISE, IDAHO 83702 greg@richardsonoleary.com peter@richardsonoleary.com	[] [x] []	U. S. Mail Postage Prepaid Hand Delivery Electronic Mail Facsimile
DON READING 6070 HILL ROAD BOISE, IDAHO 83703 dreading@mindspring.com	[] [x] []	U. S. Mail Postage Prepaid Hand Delivery Electronic Mail Facsimile
DOUGLAS C. TINGEY ASSISTANT GENERAL COUNSEL PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMO STREET, 1WTC1301 PORTLAND, OR 97204 doug.tinggey@pgn.com	[] [x] []	U. S. Mail Postage Prepaid Hand Delivery Electronic Mail Facsimile
RANDY DAHLGREN RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON STREET, 1WTC0702 PORTLAND, OR 97204 pge.opuc.filings@pgn.com	[] [x] []	U. S. Mail Postage Prepaid Hand Delivery Electronic Mail Facsimile

MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS OF OREGON IRRIGATION PUMPERS ASSN. DOCKET NO. UE 233
- Page 4

/Eric L. Olson	
ERIC L. OLSON	

MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS OF OREGON IRRIGATION PUMPERS ASSN. DOCKET NO. UE 233 - Page 5 $\,$

Eric L. Olsen (*Pro Hac Vice*, ISB No. 4811) RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED 101 South Capitol Blvd., Suite 300 Boise, Idaho 83702

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

In the Matter of IDAHO POWER)	UE 233
COMPANY)	
)	AFFIDAVIT OF TONY YANKEL
Request for General Rate Revision)	
)	

- I, Tony Yankel, being duly sworn on oath, depose and say:
- My name is Anthony J. Yankel. I am President of Yankel and Associates, Inc and a Professional Engineer testifying on behalf of Oregon Irrigation Pumpers Association ("OIPA"). My address is 29814 Lake Road, Bay Village, Ohio, 44140.
- 2. I sponsored pre-filed testimony and exhibits 100-103 on behalf of OIPA.
- 3. My testimony and exhibits that were previously filed are true and accurate. To the best of my knowledge there are no corrections necessary. My testimony would be the same today as that reflected in my pre-filed testimony.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF OREGON THAT THE FOREGOING IS TRUE AND CORRECT BASED ON MY INFORMATION AND BELIEF.

SIGNED this ___th Day of February, 2012.

SUBSCRIBED AND SWORN TO before me this 2 th day of February, 2012.

SHERYL A. MIKTUK A LNOTARY PUBLIC - OHIO MY COMMISSION EXPIRES NOTARY PUBLIC FOR 355 DOVE CENTER Residing at: Bay Ullage Ohio Killy O My Commission Expires: 4-9-2014