

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF OREGON**

Docket No. UE 426

In The Matter Of

IDAHO POWER COMPANY'S

Request for a General Rate Revision.

SUPPLMENT TO PETITION TO
INTERVENE OF THE
OREGON IRRIGATION PUMPERS
ASSOCIATION, INC.

Pursuant to ALJ, John Mellgren's, Memorandum (April 25, 2024), the Oregon Irrigation Pumpers Association, Inc. ("OIPA") hereby supplement's its Petition to Intervene ("Petition"), as follows:

1. The OIPA was formed back in 2011 to unite irrigation pumpers in Idaho Power Company's ("IPC's") Oregon service territory and participate in IPC's last rate case--UE 233. OIPA fully participated in that case which was filed in 2011 and then settled in 2012.
2. Unfortunately, with IPC not coming in for a general rate case for over 12 years and the loss of a key director, the OIPA's importance was not completely understood or appreciated by all its other members, and the OIPA regrettably went dormant.
3. IPC filed this case a little over four months ago. As soon as the OIPA's members generally became aware of IPC's rate case and its *shocking 36% proposed rate increase* to the irrigation class, its members met at the beginning of April to resurrect the OIPA and intervene in this case. Based on a review of the docket and an inquiry with a party to this case, undersigned counsel understood opening filing testimony deadlines had passed and that the parties had engaged in several settlement conferences but that no settlement had been reached. Thus, the OIPA filed its Petition as soon as possible on 4/23/24 with the intent to participate in the additional scheduled

settlement conferences and the remainder of the case as reasonably allowed by the Commission given its delayed Petition.

4. Specifically, IPC's proposed rate spread greatly exceeds recently acceptable limits in recent Oregon rate cases. IPC proposed to limit rate increases to 1.85 times the average increase. Idaho Power/200 Tatum/10. Staff opposed the high cap and proposed 1.33 times the average rate increase as a cap. Staff/1500 Stevens/37 lines 13 to 21. But the most recently agreed to cap in UE 416 is only 1.2 times the average increase. See UE 416 Fourth Partial Stipulation ¶16(b). The OIPA is very concerned about this issue and the rate shock that is happening to the irrigation class and it should in all fairness become a party and be heard on this critical issue in the remaining settlement discussions.

5. Although the use of a rate spread cap ameliorates effect of IPC's cost of service study, OIPA is also concerned about the validity of the class cost of service study. IPC's cost of service model places substantial generation costs in summer months (Idaho Power/1403 Maloney/6), despite the fact that winter months are the costliest to serve with renewable energy. Wind energy is intermittent and unreliable in winter, solar energy has limited capacity value in the winter, and battery storage requires excessive duration to meet winter needs compared to summer needs. If the settlement is viewed as reasonable, this would be an issue for any subsequent rate case.

6. OIPA understands that parties in this case have reached a tentative settlement on some issues in this case and that an additional settlement conference is scheduled for May 6, 2024. See Idaho Power's Motion to Suspend Procedural Schedule. OIPA does not want to blow up the apparent settlement the current parties to the case may have reached. However, as the second largest customer class, OIPA understands that no current parties participating in the settlement

discussions directly represent irrigation customers. As one of the rate classes that are facing the highest proposed rate increase, OIPA believes it is important that the irrigators have a voice in both ongoing settlement discussions and in the Commission's decisions on this matter. OIPA requests the opportunity to participate in subsequent settlement discussions, to offer on stipulations in this case, and be a formal party to the case so that it can be in a position to adequately assess the fairness of any resulting settlement.

7. If the OIPA does not sign on the settlement agreement, that would not prohibit the case from moving forward on this settlement track and having the Commission assessing whether the apparent settlement is fair, just and reasonable. Based on OIPA's reasonable expectation as a late comer to the party, OIPA's limited participation as outlined herein as an intervenor/party will not unduly broaden the issues or burden the record, nor will it unreasonably delay this proceeding. As such, the OIPA respectfully asks the Commission to grant it limited intervenor status.

(Signatures on next page)

DATED this 26th day of April, 2024, by:

/s/ Brian A. Faria

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DATED this 26th day of April, 2024, by:

/s/ Eric L. Olsen

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