

Joshua D. Johnson (OSB No. 106893)
RACINE, OLSON, NYE,
BUDGE & BAILEY, CHARTERED
101 South Capitol Blvd., Suite 300
Boise, Idaho 83702
Telephone: (208) 395-0011
Fax: (208) 433-0167
E-mail: jdj@racinelaw.net

Attorneys for Intervenor
Oregon Irrigation Pumpers Association, Inc.

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

In the Matter of IDAHO POWER COMPANY)	UE 233
Request for General Rate Revision)	MOTION FOR QUALIFICATION UNDER MODIFIED PROTECTIVE ORDER

The Oregon Irrigation Pumpers Association, Inc. (“OIPA”) hereby moves the Public Utility Commission of Oregon (“Commission”) to qualify the OIPA’s representatives as qualified persons under the Modified Protective Order approved in Order No. 11-419 on October 20, 2011. OIPA files this motion pursuant to paragraph 12 of the Modified Protective Order, and in support thereof states as follows:

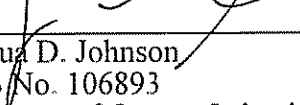
(a) The OICIP is an incorporated association of Schedule 19 customers of Idaho Power Company in Oregon. The Commission granted the OIPA intervenor status in this case, and the OIPA intends to fully participate in these proceedings by filing testimony; participating in settlement negotiations, workshops, conferences, and hearings; and filing other pleadings as required. The purpose of the OIPA is to ensure its members receive high electricity service quality and cost-of-service electricity rates. OIPA, its members, and representatives are not in competition with Idaho Power Company, and will use the Highly Confidential Information for a non-competitive purpose – to participate and advocate in this general rate case. The OIPA member companies are customers of

Idaho Power. These customers may suffer potential harm if not allowed to receive the Highly Confidential Information relevant to this proceeding because review of all information relevant to the rate case filing is necessary to adequately advocate on behalf of OIPA. This is not simply a general interest in the materials.

(b) The legitimate need identified outweighs the potential for competitive harm to Idaho Power Company resulting from disclosure. The risk of disclosure to Idaho Power Company's competitors is low because only OIPA's representatives will sign the Modified Protective Order and have access to the protected information. Also, OIPA, its members, and representatives are not in competition with Idaho Power Company. Accordingly, the representatives of the Oregon Irrigation Pumpers Association, Inc., Joshua D. Johnson and Eric L. Olson, are qualified persons under paragraphs 4(d), 4(f), and 14 of the Modified Protective Order, and have executed the Consent to be Bound Form of the Modified Protective Order enclosed with this filing.

DATED this 4th Day of November, 2011.

RACINE OLSON NYE BUDGE & BAILEY,
CHTD.

By: 
Joshua D. Johnson
OSB/No. 106893
Attorneys of Oregon Irrigation Pumpers
Association, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 4th day of November, 2011, I served a true and correct copy of the above and foregoing document to the following person(s) as follows:

LISA D. NORDSTROM [] U. S. Mail
CHRISTA BEARRY [] Postage Prepaid
IDAHO POWER COMPANY [] Hand Delivery
PO BOX 70 [x] Electronic Mail
BOISE, IDAHO 83707-0070 [] Facsimile
lnordstrom@idahopower.com
cbearry@idahopower.com

LISA F RACKNER [] U. S. Mail
MCDOWELL RACKNER & GIBSON PC [] Postage Prepaid
419 SW 11TH AVE., SUITE 400 [] Hand Delivery
PORTLAND, OR 97205 [x] Electronic Mail
lisa@mcd-law.com [] Facsimile

STEPHANIE S. ANDRUS [] U. S. Mail
ASSISTANT ATTORNEY GENERAL [] Postage Prepaid
PUC STAFF-DEPARTMENT OF [] Hand Delivery
JUSTICE [x] Electronic Mail
BUSINESS ACTIVITIES SECTION [] Facsimile
1162 COURT ST NE
SALEM, OR 97301-4096
stephanie.andrus@state.or.us

GORDON FEIGHNER [] U. S. Mail
ROBERT JENKS [] Postage Prepaid
G. CATRIONA MCCrackEN [] Hand Delivery
CITIZEN'S UTILITY BOARD OF [x] Electronic Mail
OREGON [] Facsimile
610 SW BROADWAY, STE 400
PORTLAND, OR 97205
gordon@oregoncub.org
bob@oregoncub.org
catriona@oregoncub.org

JUDY JOHNSON [] U. S. Mail
CARLA BIRD [] Postage Prepaid
PUBLIC UTILITY COMMISSION OF [] Hand Delivery
OREGON [x] Electronic Mail
PO BOX 2148 [] Facsimile
SALEM, OR 97308-2148
judy.johnson@state.or.us
carla.bird@state.or.us

MOTION FOR QUALIFICATION UNDER MODIFIED PROTECTIVE ORDER

DOCKET NO. UE 233

GREGORY M. ADAMS
PETER J. RICHARDSON
RICHARDSON & O'LEARY PLLC
PO BOX 7218
BOISE, IDAHO 83702
greg@richardsonoleary.com
peter@richardsonoleary.com

U. S. Mail
 Postage Prepaid
 Hand Delivery
 Electronic Mail
 Facsimile

DON READING
6070 HILL ROAD
BOISE, IDAHO 83703
dreading@mindspring.com

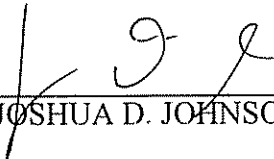
U. S. Mail
 Postage Prepaid
 Hand Delivery
 Electronic Mail
 Facsimile

DOUGLAS C. TINGEY
ASSISTANT GENERAL COUNSEL
PORTLAND GENERAL ELECTRIC
COMPANY
121 SW SALMO STREET, 1WTC1301
PORTLAND, OR 97204
doug.tingey@pgn.com

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

U. S. Mail
 Postage Prepaid
 Hand Delivery
 Electronic Mail
 Facsimile



JOSHUA D. JOHNSON

SIGNATORY PAGE
Confidential Information
DOCKET NO. UE 233

I. Consent to be Bound

This Modified Protective Order governs the use of "Confidential Information" and "Highly Confidential Information" in this proceeding.

OIPA (Party) agrees to be bound by its terms of this Modified Protective Order.

By: Signature: [Handwritten Signature]
Printed Name: Joshua D. Johnson
Date: 11-4-11

II. Persons Qualified pursuant to Paragraphs 4(a), (b), (d), and (e): Confidential Information

OIPA (Party) identifies the following person(s) automatically qualified under paragraph 4(a), (b), (d), and (e).

PRINTED NAME	DATE
Joshua D. Johnson	11-4-11
Eric L. Olsen	11/4/11

SIGNATORY PAGE
Confidential Information
DOCKET NO. UE 233

III. Persons Qualified pursuant to Paragraph (4)(c) and (f) and Paragraph 14: Confidential Information

I have read the Modified Protective Order, agree to be bound by the terms of the order, and will provide the information identified in paragraph 14.

By: Signature: *Anthony Yankel* Date: 11-4-11
Printed Name: ANTHONY YANKEL
Address: 29814 Lake Rd Bay Village OH
Employer: Yankel & Assoc, Inc
Job Title: President
 Paragraph 10(e) information also provided.

By: Signature: _____ Date: _____
Printed Name: _____
Address: _____
Employer: _____
Job Title: _____
 Paragraph 10(e) information also provided.

By: Signature: _____ Date: _____
Printed Name: _____
Address: _____
Employer: _____
Job Title: _____
 Paragraph 10(e) information also provided.

By: Signature: _____ Date: _____
Printed Name: _____
Address: _____
Employer: _____
Job Title: _____
 Paragraph 10(e) information also provided.

UE-233

Oregon Industrial Customers of Idaho Power

Paragraph 14(e) Information

Description Anthony Yankel's consulting practice:

Anthony Yankel is employed as President of Yankel & Associates, Inc. 29814 Lake Road, Bay Village, Ohio 44140. Yankel & Associates, Inc. serves a wide range of governmental and private sector clients involved in public utility regulation. In the public sector, the firm has provided consulting assistance to state utility consumer advocates in Utah, Ohio, Pennsylvania, and West Virginia. These clients have included:

Utah Committee of Consumer Services, Ohio Office of the Consumers Counsel, West Virginia Consumer Advocate.

The firm has also worked for public agencies, including cities and various school entities, including:

City of Cleveland, City of Garfield Heights, City of Boise, City of Cleveland Schools, Private Schools Association, City of Shaker Heights Schools.

In the private sector, the firm has worked for law firms, privately held and publicly owned corporations, and non-profit groups and associations, including:

The Idaho Irrigation Pumpers Association, the Montana Irrigation Pumpers Association, National Gas and Oil, Honda of America, Elyria Foundry, Osborne Mines, Summerset Gas Pipeline, the Energy Cooperative.

SIGNATORY PAGE
Highly Confidential Information
DOCKET NO. UE 233

I. Consent to be Bound

This Modified Protective Order governs the use of "Confidential Information" and "Highly Confidential Information" in this proceeding.

OIEPA (Party) agrees to be bound by its terms of this Modified Protective Order:

By: Signature: [Signature]
Printed Name: Joshua D. Johnson
Date: 11-4-11

II. Persons Qualified pursuant to Paragraph 5 and Paragraph 14: Highly Confidential Information

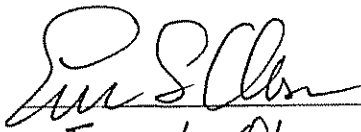
I have read the Modified Protective Order, agree to be bound by the terms of the order, and will provide the information identified in paragraph 14.

I certify that:

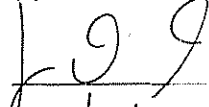
- (1) I am not now involved, and will not for a period of two years involve myself in, decision-making with respect to which the Highly Confidential Information may be relevant, by or on behalf of any company or business organization that competes, or potentially competes, with the Idaho Power Company;
- (2) I do not, and will not for a period of two years provide to any decision makers described in paragraph 12(a) information with respect to which the Highly Confidential Information may be relevant;
- (3) I understand that ORS 756.990(2) allows the Commission to impose monetary sanctions if a party subject to the jurisdiction of the Commission violates an order of the Commission.

By: Signature: [Signature] Date: 11-4-11
Printed Name: ANTHONY YANKEL
Address: 29814 Lake Rot Bay Village Ct #
Employer: Yankel + Assoc. Inc
Job Title: President

Paragraph 10(e) information also provided.

By: Signature:  Date: 11/4/11
 Printed Name: Eric L. Olsen
 Address: P.O. Box 1391, Pocatello, ID 83201
 Employer: Racine Olson Nye Budge & Bailey
 Job Title: Attorney

Paragraph 10(e) information also provided

By: Signature:  Date: 11-4-11
 Printed Name: Joshua D. Johnson
 Address: 421 101 S. CAROLINE AVE. SUITE 300, BOISE, ID 83602
 Employer: Racine Olson Nye Budge & Bailey
 Job Title: ATTORNEY

Paragraph 10(e) information also provided.

By: Signature: _____ Date: _____
 Printed Name: _____
 Address: _____
 Employer: _____
 Job Title: _____

Paragraph 10(e) information also provided.