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*Attorneys for Idaho Power Company*

**BEFORE THE DEPARTMENT OF WATER RESOURCES  
OF THE STATE OF IDAHO**

IN THE MATTER OF THE BIG WOOD  
GROUND WATER MANAGEMENT AREA

**IDAHO POWER COMPANY’S INITIAL  
WITNESS DISCLOSURE**

IN THE MATTER OF APPLICATIONS  
FOR PERMITS FOR THE DIVERSION  
AND USE OF SURFACE AND  
GROUND WATER WITHIN THE  
SNAKE RIVER BASIN

COME NOW, Idaho Power Company,(hereafter collectively referred to as “the Company” or “IPC”), by and through their undersigned counsel of record, and pursuant to the Director’s March 31, 2023 *Scheduling Order* hereby provides the following list of witnesses that

may be called at the hearing in this matter. The Company reserves the right to supplement this list as necessary.

### **Expert Witnesses**

With respect to the issue “(b) the Director’s issuance of a “moratorium on pending applications from mainstem Snake River between King Hill and Swan Falls” of the *Scheduling Order*, the Company may call the following witnesses:

#### **Sean Vincent, Idaho Department of Water Resources**

Materials relied upon by Mr. Vincent are disclosed in the Department’s witness list.

#### **Dave Shaw, ERO Resources**

Mr. Shaw is expected to testify on matters related to prior moratorium orders and Swan Falls Settlement issues related to the present Amended Moratorium Order.

#### **David Blew, Idaho Power Company**

Mr. Blew is expected to testify as to the Company’s incorporation of elements of past and present moratorium orders into the Company’s resource planning.

It is not known at this time what documents may be relied upon by the above individuals for any testimony to be offered.

#### **Dave Colvin, LRE Water**

Mr. Colvin is expected to testify on matters related to the hydrology and hydrogeology of the ESPA and hydraulically connected ground water and surface water sources above Swan Falls. The following initial list of documents may be relied upon for any testimony to be offered. Eastern Snake Plain Aquifer Model documentation, downloadable from IDWR's website (<https://idwr.idaho.gov/water-data/projects/espam/documents/>) as of May 3, 2023. Documents (with appendices and listed references) will include:

- Sukow, 2021a. *Model Calibration Report, Eastern Snake Plain Aquifer Model Version 2.2*, Idaho Department of Water Resources.
- Sukow, 2021b. *Comparison of Eastern Snake Plain Aquifer Model Version 2.2 with Version 2.1 via the Curtailment Scenario*, Idaho Department of Water Resources.
- Sukow, 2021c. *Comparison of Superposition Model with Fully-Populated Model for Eastern Snake Plain Aquifer Model Version 2.2*, Idaho Department of Water Resources.
- Sukow, 2021d. *Predictive Uncertainty Analysis, Eastern Snake Plain Aquifer Model Version 2.2*, Idaho Department of Water Resources.
- McVay, 2018. *Evapotranspiration for the Enhanced Snake Plain Aquifer Model Version 2.2*, Idaho Department of Water Resources.

The Company reserves the right to supplement these disclosures and to respond to expert reports filed in response to issues (a) and (c) as said testimony may impact issues related to the Swan Falls Settlement.

DATED this 8<sup>th</sup> May, 2023.

**MARTEN LAW LLP**



John K. Simpson

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 8<sup>th</sup> day of May, 2023, I caused to be served a true and correct copy of the foregoing **IDAHO POWER COMPANY’S INITIAL WITNESS DISCLOSURE** by the method indicated below, and addressed to each of the following:

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| <p>Director Gary Spackman<br/>IDWR<br/>322 E Front St<br/>Boise, ID 83720-0098<br/>*** service by U.S. Mail and electronic mail<br/><a href="mailto:file@idwr.idaho.gov">file@idwr.idaho.gov</a><br/><a href="mailto:gary.spackman@idwr.idaho.gov">gary.spackman@idwr.idaho.gov</a><br/><a href="mailto:garrick.baxter@idwr.idaho.gov">garrick.baxter@idwr.idaho.gov</a></p> | <p>Candice McHugh<br/>Chris Bromley<br/>McHugh Bromley, PLLC<br/>380 S. 4<sup>th</sup> St., Ste. 103<br/>Boise ID 83702<br/><br/><a href="mailto:cmchugh@mchughbromley.com">cmchugh@mchughbromley.com</a><br/><a href="mailto:cbromley@mchughbromley.com">cbromley@mchughbromley.com</a></p> | <p>Michael P. Lawrence<br/>Charlie S. Baser<br/>Givens Pursley, LLP<br/>P.O. Box 2720<br/>Boise, ID 83701-2720<br/><br/><a href="mailto:mpl@givenspursley.com">mpl@givenspursley.com</a><br/><a href="mailto:csb@givenspursley.com">csb@givenspursley.com</a></p> |
| <p>Jerry R. Rigby<br/>Chase T. Hendricks<br/>Rigby, Andrus &amp; Rigby, Chartered<br/>25 North Second East<br/>Rexburg, ID 83440<br/><br/><a href="mailto:jrigby@rex-law.com">jrigby@rex-law.com</a><br/><a href="mailto:chendricks@rex-law.com">chendricks@rex-law.com</a></p>  | <p>James R. Laski<br/>Heather E. O’Leary<br/>Lawson Laski Clark, PLLC<br/>675 Sun Valley Road, Suite A<br/>P.O. Box 3310<br/>Ketchum, Idaho 83340<br/><br/><a href="mailto:jrl@lawsonlaski.com">jrl@lawsonlaski.com</a><br/><a href="mailto:heo@lawsonlaski.com">heo@lawsonlaski.com</a></p> | <p>Robert L. Harris<br/>Holden, Kidwell, Hahn &amp; Crapo<br/>P.O. Box 50130<br/>Idaho Falls, ID 83405<br/><br/><a href="mailto:rharris@holdenlegal.com">rharris@holdenlegal.com</a></p>  |
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| <p>Dylan B. Lawrence<br/>Varin Thomas LLC<br/>242 N. 8th Street, Suite 220<br/>P.O. Box 1676<br/>Boise, Idaho 83701-1676<br/><br/><a href="mailto:dylan@varinthomas.com">dylan@varinthomas.com</a></p>   | <p>Travis L. Thompson<br/>Marten Law<br/>163 Second Ave. W<br/>Twin Falls, ID 83301<br/><br/><a href="mailto:tthompson@martenlaw.com">tthompson@martenlaw.com</a></p>  | <p>W. Kent Fletcher<br/>Fletcher Law Office<br/>P.O. Box 248<br/>Burley, ID 83318<br/><br/><a href="mailto:wkf@pmt.org">wkf@pmt.org</a></p>   |

  
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 John K Simpson