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IDAHO PUBLIC  
UTILITIES COMMISSION

Chas. F. McDevitt  
Dean J. (Joe) Miller

June 2, 2009

***Via Hand Delivery***

Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 W. Washington St.  
Boise, Idaho 83720

Re: Idaho Forest Group LLC.  
Case No. AVU-E-09-04

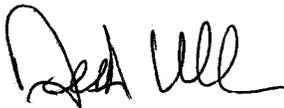
Dear Ms. Jewell:

Enclosed for filing in the above matter, please find an original and seven (7) copies of Concurrence of Idaho Forest Group in Motion to Sagebrush Energy for an Order Denying Request for Stay.

An additional copy of the document and this letter is included for return to me with your file stamp thereon.

Very Truly Yours,

McDevitt & Miller LLP



Dean J. Miller

DJM/hh  
Enclosures

ORIGINAL

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IDAHO PUBLIC  
UTILITIES COMMISSION

*Attorney for Idaho Forest Group LLC*

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF A PETITION  
FILED BY AVISTA CORPORATION  
FOR AN ORDER DETERMINING THE  
OWNERSHIP OF THE  
ENVIRONMENTAL ATTRIBUTES  
("RECS") ASSOCIATED WITH A  
QUALIFYING FACILITY UPON  
PURCHASE BY A UTILITY OF THE  
ENERGY PRODUCED BY A  
QUALIFYING FACILITY

**CASE NO. AVU-E-09-04**

**CONCURRENCE OF IDAHO FOREST  
GROUP IN MOTION OF  
SAGEBRUSH ENERGY FOR AN  
ORDER DENYING REQUEST FOR  
STAY**

COMES NOW Idaho Forest Group (IFG) and concurs in the Motion of Sagebrush Energy for an Order Denying Request for Stay filed herein on May 26, 2009, and as additional support therefore, respectfully shows as follows, to wit:

As recited in its Petition to Intervene, IFG intends to develop biomass cogeneration projects at three of its lumber mills located in North Idaho at Grangeville, Laclede and Chilco (the "Projects"). On March 17, 2009, and on March 27, 2009, IFG provided detailed information regarding the projects, as requested by Avista. On May 7, 2009, one day after the present proceeding was filed, Avista provided to IFG a template

**CONCURRENCE OF IDAHO FOREST GROUP IN MOTION OF SAGEBRUSH ENERGY FOR AN ORDER DENYING REQUEST FOR STAY-1**

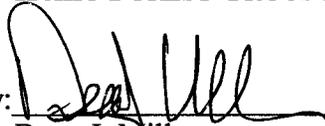
purchase power contract. IFG is in the process of preparing edits and revisions to the template agreement, which will be submitted to Avista in the near future.

Granting Avista's request for a stay of its obligation to negotiate towards execution of a purchase power agreement under the current law of environmental attribute ownership would materially impair IFG's ability to develop the Projects.

Accordingly, IFG respectfully requests that the request for stay be denied and that Avista be ordered to continue contract negotiations under the current law of environmental attribute ownership.

DATED this 7 day of June, 2009.

**IDAHO FOREST GROUP LLC**

By:  \_\_\_\_\_

Dean J. Miller

*Attorney for Idaho Forest Group LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of June, 2009, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

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BY: Heather Hruby, Legal Asst.  
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