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IDAHO PUBLIC
UTILITIES COMMISSION

201 South Main, Suite 2300
Salt Lake City, Utah 84111

May 14, 2009

VIA OVERNIGHT DELIVERY

Jean D. Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

RE: Case No. AVU-E-09-04

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

Attention: Jean D. Jewell
Commission Secretary

Enclosed please find the original and seven (7) copies of Rocky Mountain Power's Petition to Intervene in the above matter.

Sincerely,

Jeffrey K. Larsen
Vice President, Regulation

Enclosure

Cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of May, 2009, I caused to be served, via E-mail (if provided) and U.S. Mail, a true and correct copy of Rocky Mountain Power's Petition in AVU-E-09-04 to the following:

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2009 MAY 14 AM 10:45
IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF A PETITION FILED)
BY AVISTA CORPORATION FOR AN) CASE NO. AVU-E-09-04
ORDER DETERMINING THE OWNERSHIP)
OF THE ENVIRONMENTAL ATTRIBUTES)
("RECS") ASSOCIATED WITH A) PETITION FOR AN ORDER
QUALIFYING FACILITY UPON) DETERMINING OWNERSHIP OF
PURCHASE BY A UTILITY OF THE) RECS AND STAY OF ANY
ENERGY PRODUCED BY A QUALIFYING) REQUIREMENT TO AWARD
FACILITY) RECS TO A PURPA DEVELOPER

PETITION OF ROCKY MOUNTAIN POWER
FOR LEAVE TO INTERVENE AND IN SUPPORT OF AVISTA
CORPORATION'S PETITION FOR STAY OF ANY REQUIREMENT TO
AWARD RECS TO A PURPA DEVELOPER

COMES NOW PacifiCorp dba Rocky Mountain Power ("RMP" or the
"Company") and pursuant to Rule 72 of the rules of Procedure of the Idaho Public Utility
Commission, and by this Petition asks for leave to intervene herein and to appear and
participate as a party herein, and as basis therefore states as follows:

- (1) The name and address of this Intervenor is:

Rocky Mountain Power
201 S. Main St., Suite 2300
Salt Lake City, UT 84111

This Intervenor will be represented by:

Daniel E. Solander
Senior Counsel
Rocky Mountain Power
201 S. Main St., Suite 2300
Salt Lake City, UT 84111

Informal inquiries related to this Application may be directed to Ted Weston, Idaho Regulatory Affairs Manager, at (801) 220-2963. Formal correspondence and requests for additional information regarding this matter should be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

By Fax: (503) 813-6060

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

With copies to:	Daniel E. Solander	Ted Weston
	Sr. Counsel	ID Regulatory Affairs Mgr
	Rocky Mountain Power	Rocky Mountain Power
	201 South Main St.,	201 South Main St.,
	Suite 2300	Suite 2300
	Salt Lake City, Utah 84111	Salt Lake City, UT 84111

(2) RMP has a direct and substantial interest in this proceeding and intends to participate in all respects herein as a party as may be required to represent its interests.

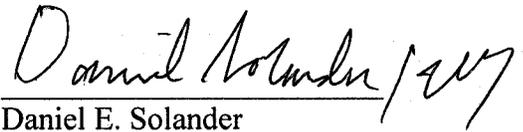
(3) Without the opportunity to intervene herein, RMP would be without a manner or means of participating in the lawful determination of issues which will affect the rates that it pays for Renewable Energy Credits (“RECs”) and the rates that RMP’s customers are required to pay for energy from wind developers.

(4) RMP also supports the request for stay of any requirement to award RECs to a developer that has tendered or that may tender a PURPA project to RMP until such time as a final order is issued that fully resolves the issues raised in Avista’s Petition to

Determine Ownership of RECs filed with the Commission on May 5, 2009. RMP is currently negotiating contracts with several proposed PURPA projects, and if RMP does not receive the RECs associated with those projects when it purchases the energy its customers will be forced to overpay significantly over the life of those contracts.

WHEREFORE, RMP requests that: (1) the Commission confirm RMP's leave to intervene in this proceeding, and to appear and participate in all matters as may be necessary and appropriate, and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in these proceedings; and (2) the Commission grant Avista's request for a stay of any requirement to award RECs to a developer that has tendered or may tender a PURPA project until the Commission has entered a final order resolving the issues raised in Avista's Petition to Determine Ownership of RECs.

DATED this 14th day of May, 2009.



Daniel E. Solander
Yvonne R. Hogle

Attorneys for
Rocky Mountain Power