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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorneys for Exergy Development Group of Idaho

BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF A REVIEW OF THE )  
SURROGATE AVOIDABLE RESOURCE )  
(SAR) METHODOLOGY FOR )  
CALCULATING PUBLISHED AVOIDED )  
COST RATES )

CASE NO. GRN-E-09-03

PETITION TO INTERVENE  
OF EXERGY DEVELOPMENT  
GROUP OF IDAHO

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COMES NOW, Exergy Development Group of Idaho, LLC, hereinafter referred to as  
"Intervenor," and pursuant to this Commission's Rules of Procedure, Rule 71 IDAPA  
31.01.01.71 hereby petitions the Commission for leave to intervene herein and to appear and  
participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

Exergy Development Group of Idaho  
c/o Peter J. Richardson  
Richardson & O'Leary  
515 N. 27<sup>th</sup> St  
P.O. Box 7218  
Boise, Idaho 83702  
Telephone: (208) 938-7901

Fax: (208) 938-7904  
peter@richardsonandoleary.com

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Peter J. Richardson as noted above and to:

Dr. Don Reading  
6070 Hill Road  
Boise, Idaho 83703  
(208) 342-1700 Tel  
(208) 384-1511 Fax  
dreading@mindspring.com

2. This Intervenor, Exergy Development Group of Idaho, LLC (“Exergy”) is an Idaho limited liability company in the business, inter alia, of development wind energy projects. Many of the wind energy projects developed by Exergy are so-called PURPA projects. Exergy claims a direct and substantial interest in this proceeding in that the outcome will affect the rates investor-owned utilities subject to this Commission’s jurisdiction offer to purchase the output from Exergy-developed wind projects.

3. This Intervenor, in its capacity intends to participate herein as a party, and if necessary, to introduce evidence, submit comments, and fully participate in any hearing that may occur including the calling and cross examination of witnesses. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

5. Without the opportunity to intervene herein, this Intervenor would be without any effective means of participation in this proceeding which may have a material impact on its ability to continue doing business in Idaho.

6. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

**WHEREFORE**, Exergy Development Group of Idaho, LLC respectfully requests that this Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument at any hearing that may occur, and to otherwise fully participate in these proceedings.

DATED this 21<sup>st</sup> day of June 2010.

Richardson & O'Leary, LLP

By   
Peter J. Richardson  
Richardson & O'Leary, PLLC

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 21st day of June, 2010, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY EXERGY DEVELOPMENT GROUP OF IDAHO, PLLC, was served by the method indicated below, and addressed to the following:

Jean Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
472 West Washington  
Boise, Idaho 83702  
Hand Delivery

Michael Andrea  
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1411 East Mission Ave.  
P.O. Box 3727  
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Idaho Wind Farms, LLC  
Glenn Ikemoto  
672 Blair Ave.  
Piedmont, CA 94611  
U.S. Mail

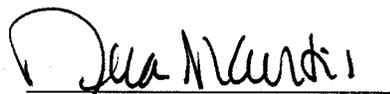
Renewable Energy Coalition  
Thomas H. Nelson  
PO Box 1211  
Welches, OR 97067

Scott Woodbury  
Deputy Attorney General  
Idaho Public Utilities Commission  
472 West Washington St.  
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Daniel E. Solander  
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201 South Main St.  
Salt Lake City, UT 84111  
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Sagebrush Energy, LLC and  
Idaho Forest Group, LLC  
Dean J. Miller  
PO Box 2564  
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Idaho Power Company  
Donovan Walker  
PO Box 70  
Boise, ID 83702



Nina Curtis  
Administrative Assistant