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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE JOINT
PETITION OF IDAHO POWER
COMPANY, AVISTA CORPORATION,
AND ROCKY MOUNTAIN POWER TO
ADDRESS AVOIDED COST ISSUES
AND JOINT MOTION TO ADJUST THE
PUBLISHED AVOIDED COST RATE
ELIGIBILITY CAP

[PROPOSED] CASE NO. GNR-^E~~7~~-10-04
RENEWABLE ENERGY COALITION'S
CONTINGENT PETITION FOR PARTY-
INTERVENOR STATUS

In accordance with Rule 72 of the IPUC's Rules of Procedure, the Renewable Energy Coalition ("REC"), an Oregon assumed business name for a coalition of renewable energy owners and developers over a dozen existing or proposed hydroelectric or biomass projects located in Idaho, Oregon, and Montana which sell or are expected to sell their output to the three IPUC jurisdictional investor-owned electric utilities ("IOUs") that filed a Joint Petition with the Commission on November 5, 2010, respectfully petitions the Commission for intervenor-party status in any proceeding instituted in response to the Joint Petition.

I. REC'S INTEREST IN THIS PROCEEDING

The Renewable Energy Coalition has a direct and substantial interest in proceeding proposed by the IOUs' Joint Petition filed on November 5, 2010, because a number of its members' projects are either under contract to sell power at avoided-cost prices to the IOUs or, in the case of proposed projects, considering the sale of output to such IOUs. Consequently, any determinations made in this docket may affect the financial viability of its members.

Since REC represents only small non-intermittent, non-wind powered Qualifying Facilities, most of which have operated for a significant period, REC's interests are not represented by any party to this proceeding, and its comments will be directly relevant to the issues raised in this docket. REC's intervention will not expand the scope of the proceeding.

II. NOTICE

Service of notices, orders, and other communications and correspondence in any proceeding instituted in response to the Joint Petition should be directed to counsel and REC's representative at the addresses set forth below (e-mail service is preferred):

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John R. Lowe
Consultant to Renewable Energy Coalition
12050 SW Tremont Street
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tel: 503.372.6909
e-mail: jravenesanmarcos@yahoo.com

III. CONCLUSION

REC's participation in any proceeding opened by the Commission as a consequence of the Joint Petition will not prejudice any party and will not delay the schedule or broaden the scope of the issues of any resulting proceeding. For the reasons stated above, REC respectfully requests that the Commission, in the event it opens a proceeding in response to the Joint Motion: (a) to grant this Petition for Party-Intervenor Status, and (b) place REC on the service list for this proceeding.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas H. Nelson". The signature is fluid and cursive, with a long horizontal stroke at the end.

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Attorney for Renewable Energy Coalition

November 9, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have on this 9th day of November, 2010, I served a copy of the foregoing Contingent Petition of Renewable Energy Coalition for Party-Intervenor Status on the entities designated as served by the Joint Petitioners in the captioned docket on November 5, 2010, by serving an electronic copy on their email addresses of record as set forth below. The original and seven (7) copies of this document were filed with the Commission electronically and by United States Mail, postage prepaid, on the 9th of November, 2010.

Jean Jewell, Secretary Idaho Public Utilities Commission 472 West Washington Street P.O. Box 83720 Boise, ID 83720-0074 jjewell@puc.state.id.us	Hand Delivered _____ U.S. Mail <u>X</u> (Original + 7 Copies) Facsimile _____ Federal Express _____ Electronic Mail <u>X</u> _____
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Michael G. Andrea Senior Counsel Avista Corporation 1411 E. Mission Avenue, MSC-23 Spokane, WA 99202 michael.andrea@avistacorp.com	Hand Delivered _____ U.S. Mail _____ Facsimile _____ Federal Express _____ Electronic Mail <u>X</u>
Sagebrush Energy, LLC Dean J. Miler MCDEVITT & MILLER P.O. Box 2564 Boise, Idaho 83701 joe@mcdevittmiller.com	Hand Delivered _____ U.S. Mail _____ Facsimile _____ Federal Express _____ Electronic Mail <u>X</u>

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This Certificate of Service is executed on November 9, 2010, at Zigzag, Oregon.



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