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Dean J. (Joe) Miller

March 3, 2011

Via Hand Delivery

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

RECEIVED
2011 MAR -3 PM 3:56
IDAHO PUBLIC UTILITIES COMMISSION

Re: Renewable Northwest Project—GNR-E-11-01

Dear Ms. Jewell:

Enclosed for filing in the above matter, please find an original and seven copies of a Petition to Intervene of Renewable Northwest Project.

Kindly return a file stamped copy to me.

Very Truly Yours,

McDevitt & Miller LLP



Dean J. Miller

DJM/hh
Enclosures

RECEIVED

2011 MAR -3 PM 3: 56

IDAHO PUBLIC UTILITIES COMMISSION

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Attorneys for Renewable Northwest Project

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE
COMMISSION'S INVESTIGATION
INTO DISAGGREGATION AND AN
APPROPRIATE PUBLISHED
AVOIDED COST RATE ELIGIBILITY
CAP STRUCTURE

Case No. GNR-E-11-01

PETITION TO INTERVENE OF
RENEWABLE NORTHWEST PROJECT

COMES NOW Renewable Northwest Project ("RNP") and pursuant to RP 71 petitions to
intervene in the above entitled manner and in support thereof respectfully shows as follows:

I.

RNP, an Oregon nonprofit corporation, is a regional advocacy group comprised of more
than 50 public interest and business members who seek to promote environmentally responsible
renewable resources across the Northwest region, focusing primarily on wind, solar, and

geothermal technologies.¹ RNP has appeared before the Idaho Public Utilities Commission (PUC) on several occasions,² and supports a strong and healthy market for all segments of the renewable energy industry in Idaho. RNP has a direct and substantial interest in this proceeding.

II.

All pleadings, papers, orders and notices should be served upon:

Dean J. Miller, Esq.
McDEVITT & MILLER LLP
420 W. Bannock Street
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and

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Senior Staff Counsel
Renewable Northwest Project
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Tel: 503-223-4544
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III.

RNP intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

¹ A list of RNP's member organizations is available at http://www.rnp.org/our_members (March 2011).

² Prior dockets in which RNP has participated as an intervenor or by public comment include IPC-E-05-22, IPC-E-07-03/AVU-E-07-02/PAC-E-07-07, PAC-E-09-07, IPC-E-08-24, and IPC-E-09-33. RNP submitted public comments in GNR-E-10-04, but did not appear as an intervenor.

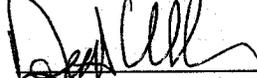
IV.

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

WHEREFORE, RNP respectfully requests that this petition to intervene be granted.

DATED this 3 day of March, 2011.

RENEWABLE NORTHWEST PROJECT



Deah J. Miller

Attorney for Renewable Northwest Project

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of March, 2011, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

Jean Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
P.O. Box 83720
Boise, ID 83720-0074
jjewell@puc.state.id.us

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BY: Heather Houle
MCDEVITT & MILLER LLP