

July 13, 2012

Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho 83720-0074

Re: Our Client: Twin Falls Canal Company; North Side Canal Company;
Big Wood Canal Company and AFRD #2
CLG File No. 6417.000

Dear Commissioners:

Enclosed please find an original and nine copies of the Petition to Intervene by Big Wood Canal Company and American Falls Reservoir District No. 2.

If you have any questions or comments, please do not hesitate to contact me.

Sincerely,

Capitol Law Group, PLLC



Lori Thomas
Paralegal to C. Tom Arkoosh

CTA/lbt
Enclosures

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C. Tom Arkoosh
CAPITOL LAW GROUP, PLLC.
205 N. 10th Street, 4th floor
PO Box 2598
Boise, ID 83701
Telephone: (208) 424-8872
Facsimile: (208) 424-8874
tarkoosh@capitollawgroup.com
Idaho State Bar No. 2253

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IDAHO PUBLIC
UTILITIES COMMISSION

*Attorneys for Petitioners Big Wood Canal Company and
American Falls Reservoir District No. 2*

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE
COMMISSION'S REVIEW OF PURPA
QF CONTRACT PROVISIONS
INCLUDING THE SURROGATE
AVOIDED RESOURCE (SAR) AND
INTEGRATED RESOURCE
PLANNING (IRP) METHODOLOGIES
FOR CALCULATING PUBLISHED
AVOIDED COST RATES

Case No. GNR-E-11-03

**PETITION TO INTERVENE BY BIG
WOOD CANAL COMPANY AND
AMERICAN FALLS RESERVOIR
DISTRICT NO. 2**

BIG WOOD CANAL COMPANY and AMERICAN FALLS RESERVOIR DISTRICT NO. 2, collectively "Petitioners" hereby petition the Commission for leave to intervene in the above-entitled proceedings pursuant to Rules 71 through 75 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.072-075. Petitioners submit the following information in support of this Petition:

1. Petitioners' names and address are as follows:

**Big Wood Canal Company
American Falls Reservoir District No. 2
409 N. Apple Street
Shoshone, Idaho 83352**

2. Petitioners' representatives for the purpose of service of pleadings and other written materials are:

C. Tom Arkoosh
CAPITOL LAW GROUP, PLLC.
205 N. 10th Street, 4th floor
PO Box 2598
Boise, ID 83701
Telephone: (208) 424-8872
Facsimile: (208) 424-8874
tarkoosh@capitollawgroup.com
Idaho State Bar No. 2253

3. Together, Big Wood Canal Company and American Falls Reservoir District No. 2 have a direct and substantial interest in the outcome of these proceedings. Petitioners are joint partners in hydro power generation projects on the Milner-Gooding Canal. Electric output from the projects is sold to Idaho Power Company. Various aspects of Idaho Power Company's Proposal could directly or indirectly affect Petitioners' rights and obligations under its current and future contracts with Idaho Power Company. These issues include, but are not limited to: The proposed Schedule 74 "curtailment", the absence of carbon related costs in the proposal, proposed contract terms and standard offer cap limits.

4. Petitioners have good cause and substantial reason for seeking intervention after the deadline established in Order No. 32352. Petitioners were only recently able to confirm through review of direct testimony and discovery and after joint meeting of both boards that the proposals by Idaho Power Company could have substantial impact on Petitioners' rights and obligations.

5. Petitioners' intervention will not disrupt the proceedings or prejudice existing parties or unduly broaden the issues beyond those listed in Order No. 32352. Petitioners agree to be bound by all scheduling orders existing in this docket prior to its intervention. Furthermore, Petitioners

will be represented in this matter by C. Thomas Arkoosh who currently represents Twin Falls Canal Company and North Side Canal Company in these proceedings. Therefore, Petitioners' participation will be limited to joining the position taken by Twin Falls Canal Company and North Side Canal Company, and the presentation of the same evidence, cross-examination briefing and argument. Petitioners will not seek to present any additional argument or evidence that would not otherwise have been offered, but merely wish to assert their rights and interest in this matter.

For these reasons, Big Wood Canal Company and American Falls Reservoir District No. 2 respectfully ask this Commission to grant their Petition to intervene.

DATED this 13th day of July, 2012.

CAPITOL LAW GROUP, PLLC

By: _____



C. Tom Arkoosh, Of the Firm
*Attorney Big Wood Canal Company and
American Falls Reservoir District No. 2*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13~~th~~ day of July, 2012, I served a true and correct copy of the foregoing upon each of the following individuals by causing the same to be delivered by the method and to the addresses indicated below:

Jean Jewell, Commission Secretary
Idaho Public Utilities Commission
427 W. Washington St.
Boise, Idaho 83702

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail jean.jewell@puc.idaho.gov

Daniel Solander
Rocky Mountain Power
201 S. Main St., Ste. 300
Salt Lake City, UT 84111

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail daniel.solander@pacificorp.com

Ronald L. Williams
Williams Bradbury PC
1015 W. Hays St.
Boise, Idaho 83702

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail ron@williamsbradbury.com

Robert A. Paul
Grand View Solar II
15690 Vista circle
Desert Hot Springs, CA 92241

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail robertapaul08@gmail.com

R. Greg Ferney
Mimura Law Offices, PLLC
2176 E. Franklin Rd., Ste. 120
Meridian, Idaho 83642

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail greg@mimuralaw.com

Bill Piske, Manager
Interconnect Solar Development, LLC
1303 E. Carter
Boise, Idaho 83706

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail billpiske@cableone.net

Robert D. Kahn, Executive Director
Northwest and Intermountain Power
Producers Coalition
1117 Minor Ave., Ste. 300
Seattle, WA 98101

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail rkahn@nippc.org

Michael G. Andrea
Avista Corporation
1411 East Mission Ave.
Spokane, WA 99202

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail michael.andrea@avistacorp.com

Dean J. Miller
McDevitt & Miller, LLP
P.O. Box 2564
Boise, Idaho 83701

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail joe@mcdevitt-miller.com

Don Sturtevant, Energy Director
J.R. Simplot Company
P.O. Box 27
Boise, Idaho 83707

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail don.sturtevan@simplot.com

James Carkulis, Managing Member
Exergy Development Group of ID, LLC
802 W. Bannock St., Ste. 1200
Boise, Idaho 83702

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail
jcarkulis@exergydevelopment.com

M.J. Humphries
Blue Ribbon Energy LLC
4515 S. Ammon Rd.
Ammon, Idaho 83406

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail blueribbonenergy@gmail.com

Brian Olmstead, General Manager
Twin Falls Canal Company
P.O. Box 326
Twin Falls, Idaho 83303

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail olmstead@tfcanal.com

John R. Lowe
Consultant to Renewable Energy
Coalition
12050 SW Tremont St.
Portland, OR 97225

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail jravenesanmarcos@yahoo.com

Donovan E. Walker
Jason B. Williams
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707-0700

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail dwalker@idahopower.com
jwilliams@idahopower.com

Ted Sorensen PE
Birch Power Company
5203 South 11th East
Idaho Falls, Idaho 83404

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail ted@tsorenson.net

Bill Brown, Chair
Board of Commissioners of Adams
County, ID
P.O. Box 48
Council, Idaho 83612

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail bdbrown@frontiernet.net

Donald L. Howell, II
Kristine A. Sasser
Deputy Attorneys General
Idaho Public Utilities Commission
472 W. Washington St.
Boise, Idaho 83702

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail don.howell@puc.idaho.gov
kris.sasser@puc.idaho.gov

Arron F. Jepsen
Blue Ribbon Energy, LLC
10660 South 540 East
Sandy, UT 84070

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail arronesq@aol.com

Wade Thomas, General Counsel
Dynamis Energy, LLC
776 W. Riverside Dr., Ste. 15
Eagle, Idaho 83616

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail wthomas@dynamisenergy.com

Glenn Ikemoto
Margaret Rueger
Idaho Windfarms, LLC
672 Blair Ave.
Piedmont, CA 94611

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail glenni@envisionwind.com
margaret@envisionwind.com

Ted Diehl, General Manager
North Side Canal Company
921 N. Lincoln St.
Jerome, Idaho 83338

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail nscanal@cableone.net

Megan Walseth Decker
Senior Staff Counsel
Renewable Northwest Project
917 SW Oak St., Ste. 303
Portland, OR 97205

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail megan@rnp.org

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
P.O. Box 7218
Boise, Idaho 83702

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail peter@richardsonandoleary.com
greg@richardsonandoleary.com

Marv Lewallen
Clearwater Paper Corporation
601 W. Riverside Ave., Ste. 1100
Spokane, WA 99201

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail
marv.lewallen@clearwaterpaper.com

Benjamin J. Otto
Idaho Conservation League
P.O. Box 844
Boise, Idaho 83701

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail botto@idahoconservation.org

Don Schoenbeck
RCS
900 Washington St., Ste. 78
Vancouver, WA 98660

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail dws@r-c-s-inc.com

Liz Woodruff
Ken Miller
Snake River Alliance
P.O. Box 1731
Boise, Idaho 83701

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail
lwoodruff@snakeriveralliance.org
kmiller@snakeriveralliance.org

Deborah E. Nelson
Kelsey J. Nunez
Givens Pursley LLP
P.O. Box 2720
Boise, Idaho 83701-2720

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail den@givenspursley.com
kjn@givenspursley.com

Dr. Don Reading
6070 Hill Rd.
Boise, Idaho 83703

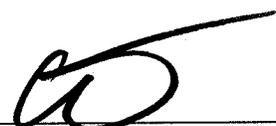
U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail dreading@mindspring.com

Tauna Christensen
Energy Integrity Project
769 N. 1100 E.
Shelley, Idaho 83274

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail
tauna@energyintegrityproject.org

Lynn Harmon
American Falls Reservoir Dist. #2
409 N. Apple St.
Shoshone, Idaho 83352

U.S. Mail, postage prepaid
 Hand-Delivered
 Overnight Mail
 Facsimile
 Via E-Mail lynnharmon@cableone.net



C. Thomas Arkoosh