

Energy Integrity Project
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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE COMMISSION'S)	
REVIEW OF PURPA QF CONTRACT)	CASE NO. GNR -E-11-03
PROVISIONS INCLUDING THE)	
SURROGATE AVOIDED RESOURCE (SAR))	PETITION TO INTERVENE OF
AND INTEGRATED RESOURCE PLANNING)	ENERGY INTEGRITY
(IRP) METHODOLOGIES FOR)	PROJECT
CALCULATING PUBLISHED AVOIDED)	
COST RATES.)	
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COMES NOW, ENERGY INTEGRITY PROJECT, 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:

Energy Integrity Project
c/o Tauna Christensen
769 N 1100 E
Shelley, Idaho 83274
(208) 757-1717
tauna@energyintegrityproject.org

Copies of all pleadings, Commission orders, and other documents should be provided to Tauna Christensen at the address stated above.

2. This Intervenor, Energy Integrity Project, is a citizens' organization representing the interests of ratepayers and taxpayers. Energy Integrity Project's members are ratepayers.

3. Energy Integrity Project claims a direct and substantial interest in this proceeding because the outcome of this proceeding is very likely to impact the rates of ratepayers.
4. This Intervenor 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.
5. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case. This Intervenor does not intend to broaden the issues beyond those listed in IPUC Order No. 32352 issued in this docket. This Intervenor agrees to be bound by all prior orders existing in this docket prior to its intervention.
6. Although this Petition to Intervene is filed after the deadline set in Order No. 32352, this Intervenor requests leave to intervene after the deadline on the ground that this Intervenor will not raise additional issues and that the matter has not yet proceeded to filing of testimony.
7. Because this proceeding is very likely to impact the rates of ratepayers, good cause exists to grant this Petition. Granting intervention at this time will not disrupt the proceedings or prejudice any other parties. Intervention is therefore proper pursuant to this Commission's Rules of Procedure, Rule 73 IDAPA 31.01.01.73.

WHEREFORE, Energy Integrity Project 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 and to otherwise fully participate in these proceedings.

Dated this 20th day of March 2012

Energy Integrity Project

By *Tauna Christensen*
Tauna Christensen

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of March, 2012, a true and correct copy of the within and foregoing PETITION TO INTERVENE of ENERGY INTEGRITY PROJECT was served as shown to:

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