

Deborah E. Nelson, ISB # 5711
Kelsey J. Nunez, ISB# 7899
GIVENS PURSLEY LLP
601 W. Bannock St.
Post Office Box 2720
Boise, Idaho 83701-2720
Telephone: 208-388-1200
Facsimile: 208-388-1300
11067-6_1459266_3

RECEIVED
2012 APR 27 PM 3:43
IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Idaho Wind Partners I, LLC

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

**IDAHO WIND PARTNERS I, LLC'S
PETITION TO INTERVENE**

IDAHO WIND PARTNERS I, LLC ("IWP") hereby petitions the Commission for leave to intervene in the above-entitled proceeding pursuant to Rules 71 through 75 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.072-.075. In support of this Petition, IWP states as follows:

1. The name and address of IWP is:

Idaho Wind Partners I, LLC
c/o RP Wind ID, LLC, its Managing Member
82 Elm Street
PO Box 2049
Manchester Center, VT 05255

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

Deborah E. Nelson
Kelsey J. Nunez
GIVENS PURSLEY LLP
601 W. Bannock Street
P.O. Box 2720
Boise, ID 83701-2720
Telephone No. (208) 388-1200
Fax No. (208) 388-1300
Email address: den@givenspursley.com
kjn@givenspursley.com

3. IWP is the owner of 11 wind farm developments, with a combined capacity of 183 MW, in the Magic Valley of Idaho. IWP's project portfolio in Idaho consists of the following projects: Burley Butte, Golden Valley, and Milner Dam in Cassia County; Camp Reed in Elmore County; and Oregon Trail, Payne's Ferry, Pilgrim Stage Station, Salmon Falls, Thousand Springs, Tuana Gulch, and Yahoo Creek in Twin Falls County (collectively, the "Projects"). The Projects are Qualifying Facilities ("QFs") pursuant to the Public Utility Regulatory Policies Act of 1978 ("PURPA").

4. IWP claims a direct and substantial interest in this proceeding because IWP's Projects are all subject to existing Firm Energy Sales Agreements ("FESAs") with Idaho Power and this Commission's decision on some or all of the issues presented, including but not limited to Idaho Power's proposed operational dispatch tariff, Schedule 74, could directly or indirectly affect the rights and obligations under IWP's FESAs.

5. Although this petition is filed after the deadline established in Order No. 32352, IWP has good cause for the untimely filing and a substantial reason for delay given that IWP recently confirmed that certain proposals raised in direct testimony, such as Idaho Power

Company's proposed Schedule 74, could, if approved by the Commission, apply retroactively to existing contracts and therefore may have a direct and indirect impact on IWP's FESAs.

6. IWP's intervention will not disrupt or prejudice existing parties or unduly broaden the issues beyond those listed in IPUC Order No. 32352 issued in this docket. IWP agrees to be bound by all scheduling orders existing in this docket prior to its intervention. Given the existing scheduling order, IWP does not intend to introduce direct testimony but does intend to fully participate as a party, including legal briefing, for the remainder of the proceeding.

7. Without the opportunity to intervene herein, IWP would be without any means of participation in this proceeding, which may have a material impact on the rates, terms and conditions under which it is entitled to sell the output of the Projects.

WHEREFORE, IWP respectfully requests that the Commission grant this Petition to Intervene and authorize IWP to participate in the above-entitled proceedings with full rights as a formal party.

DATED this 27th day of April 2012.

GIVENS PURSLEY, LLP

By: 

Deborah E. Nelson

Attorneys for Idaho Wind Partners I, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of April, 2012, the foregoing was served upon the following individual(s) by the means indicated:

Original plus 7 copies:

Jean Jewell
Secretary
Idaho Public Utilities Commission
472 W. Washington
P.O. Box 83720
Boise, ID 83720-0074
jean.jewell@puc.idaho.gov

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Service copies:

Donovan E. Walker
Jason B. Williams
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
E-mail: dwalker@idahopower.com
jwilliams@idahopower.com
Idaho Power Company

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Michael G. Andrea
Avista Corporation
1411 E. Mission Ave.
Spokane, WA 99202
E-mail: michael.andrea@avistacorp.com
Avista Corporation

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Daniel Solander
PacifiCorp / dba Rocky Mountain Power
201 S. Main St., Suite 2300
Salt Lake City, UT 84111
E-mail: danielsolander@pacificorp.com
Pacificorp, dba Rocky Mountain Power

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Donald L. Howell, II
Kristine A. Sasser
Deputy Attorneys General
Idaho Public Utilities Commission
472 W. Washington (83702)
PO Box 83720
Boise, ID 83720-0074
E-mail: don.howe@puc.idaho.gov
kris.sasser@puc.idaho.gov

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
PO Box 7218
Boise, ID 83702
E-mail: peter@richardsonandoleary.com
greg@richardsonandoleary.com
*The Northwest and Intermountain Power
Producers Coalition*

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Robert D. Kahn
Executive Director
Northwest and Intermountain Power
Producers Coalition
1117 Minor Ave., Suite 300
Seattle, WA 98101
E-mail: rkahn@nippc.org
*The Northwest and Intermountain Power
Producers Coalition*

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
PO Box 7218
Boise, ID 83702
E-mail: peter@richardsonandoleary.com
greg@richardsonandoleary.com
J.R. Simplot Company

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Don Sturtevant
Energy Director
J.R. Simplot Company
PO Box 27
Boise, ID 83707-0027
E-mail: don.sturtevant@simplot.com
J.R. Simplot Company

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
PO Box 7218
Boise, ID 83702
E-mail: peter@richardsonandoleary.com
greg@richardsonandoleary.com
Grand View Solar II

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Robert A. Paul
Grand View Solar II
15690 Vista Circle
Desert Hot Springs, CA 92241
E-mail: robertapau108@gmail.com
Grand View Solar II

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
PO Box 7218
Boise, ID 83702
E-mail: peter@richardsonandoleary.com
greg@richardsonandoleary.com
Exergy Development Group of Idaho, LLC

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

James Carkulis
Managing Member
Exergy Development Group of Idaho, LLC
802 W. Bannock St., Suite 1200
Boise, ID 83702
E-mail: jcarkulis@exergydevelopment.com
Exergy Development Group of Idaho, LLC

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Dr. Don Reading
6070 Hill Road
Boise, ID 83703
E-mail: dreading@mindspring.com
Exergy Development Group of Idaho, LLC

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Ronald Williams
Williams Bradbury, P.C.
1015 W. Hays St.
Boise, ID 83702
E-mail: ron@williamsbradbury.com
Renewable Energy Coalition

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

John R. Lowe
12050 SW Tremont St.
Portland, OR 97225
E-mail: jravenesanmarcos@yahoo.com
Renewable Energy Coalition

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

R. Greg Ferney
Mimura Law Offices, PLLC
2176 E. Franklin Rd., Suite 120
Meridian, ID 83642
E-mail: greg@mimuralaw.com
Interconnect Solar Development, LLC

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Bill Piske, Manager
Interconnect Solar Development, LLC
1303 E. Carter
Boise, ID 83706
E-mail: billpiske@cableone.net
Interconnect Solar Development, LLC

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Ronald L. Williams
Williams Bradbury, P.C.
1015 W. Hays Street
Boise, ID 83702
E-mail: ron@williamsbradbury.com
Dynamis Energy, LLC

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Wade Thomas
General Counsel
Dynamis Energy, LLC
776 W. Riverside Dr., Suite 15
Eagle, ID 83616
E-mail: wthomas@dynamisenergy.com
Dynamis Energy, LLC

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

C. Thomas Arkoosh
Capitol Law Group, PLLC
205 N. 10th St., 4th Floor
PO Box 2598
Boise, ID 83701
E-mail: tarkoosh@capitolawgroup.com
North Side Canal Company
Twin Falls Canal Company

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Brian Olmstead
General Manager
Twin Falls Canal Company
PO Box 326
Twin Falls, ID 83303
E-mail: olmstead@tfcanal.com
Twin Falls Canal Company

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Ted Diehl
General Manager
North Side Canal Company
921 N. Lincoln St.
Jerome, ID 83338
E-mail: nscanal@cableone.net
North Side Canal Company

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
PO Box 7218
Boise, ID 83702
E-mail: peter@richardsonandoleary.com
greg@richardsonandoleary.com
The Board of County Commissioners of Adams County, Idaho

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Bill Brown, Chair
Board of Commissioners
of Adams County, ID
PO Box 48
Council, ID 83612
E-mail: bdbrown@frontiernet.net
The Board of County Commissioners of Adams County, Idaho

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Ted S. Sorenson, P.E.
Birch Power Company
5203 South 11th East
Idaho Falls, ID 83404
E-mail: ted@tsorenson.net
Birch Power Company

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Glenn Ikemoto
Margaret Rueger
Idaho Windfarms, LLC
672 Blair Avenue
Piedmont, CA 94611
E-mail: glenni@envisionwind.com
margaret@envisionwind.com
Idaho Windfarms, LLC

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Dean J. Miller
McDevitt & Miller, LLP
420 W. Bannock St. (83702)
PO Box 2564
Boise, ID 83701
E-mail: joe@mcdevitt-miller.com
Idaho Windfarms, LLC

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

M.J. Humphries
Blue Ribbon Energy LLC
4515 S. Ammon Road
Ammon, ID 83406
E-mail: blueribbonenergy@gmail.com
Blue Ribbon Energy LLC

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Arron F. Jepson
Blue Ribbon Energy LLC
10660 South 540 East
Sandy, UT 84070
E-mail: arronesq@aol.com
Blue Ribbon Energy LLC

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Dean J. Miller
McDevitt & Miller, LLP
420 W. Bannock St. (83702)
PO Box 2564
Boise, ID 83701
E-mail: joe@mcdevitt-miller.com
Renewable Northwest Project

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Megan Walseth Decker
Senior Staff Counsel
Renewable Northwest Project
421 SW 6th Avenue, Suite 1125
Portland, OR 97204
E-mail: megan@mp.org
Renewable Northwest Project

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Benjamin J. Otto
Idaho Conservation League
710 N. Sixth Street (83702)
PO Box 844
Boise, ID 83701
E-mail: botto@idahoconservation.org
Idaho Conservation League

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Liz Woodruff
Ken Miller
Snake River Alliance
PO Box 1731
Boise, ID 83701
Email: lwoodruff@snakeriveralliance.org
kmiller@snakeriveralliance.org
Snake River Alliance

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
PO Box 7218
Boise, ID 83702
E-mail: peter@richardsonandoleary.com
greg@richardsonandoleary.com
Clearwater Paper Corporation

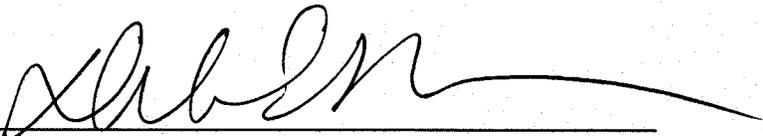
- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Marv Lewallen
Clearwater Paper Corporation
601 W. Riverside Ave., Suite 1100
Spokane, WA 99201
E-mail: marv.lewallen@clearwaterpaper.com
Clearwater Paper Corporation

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail

Tauna Christensen
Energy Integrity Project
769 N 1100 E
Shelley, ID 83274
E-mail: tauna@energyintegrityproject.org
Energy Integrity Project

- U.S. Mail, postage prepaid
- Express Mail
- Hand Delivery
- Facsimile
- E-Mail



Deborah E. Nelson