



RECEIVED
2012 AUG -2 PM 4: 22
IDAHO PUBLIC
UTILITIES COMMISSION

Idaho Winds LLC

02 August 2012

Ms. Jean Jewell, Secretary
Idaho Public Utilities Commission
472 W. Washington St.
Boise, Idaho 83720
Via Hand Delivery

**Subject: GNR-E-11-03
Idaho Winds LLC**

Ms. Jewell,

Please find enclosed for filing in the matter above, an original plus seven copies of Idaho Winds LLC's Petition to Intervene.

Please contact me if you have any questions.

Sincerely,

Idaho Winds LLC

A handwritten signature in black ink, appearing to read "Rick Koebbe". The signature is written in a cursive, slightly slanted style.

Rick Koebbe
President

Enclosures

RECEIVED

2012 AUG -2 PM 4: 23

IDAHO PUBLIC UTILITIES COMMISSION

Idaho Winds LLC
Rick Koebbe
5420 W. Wicher Road
Glenns Ferry, Idaho 83623
208.853.4602
rk@powerworks.com

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)	IDAHO WINDS LLC'S
SURROGATE AVOIDED RESOURCE (SAR))	PETITION TO INTERVENE
AND INTEGRATED RESOURCE)	
PLANNING (IRP) METHODOLOGIES FOR)	
CALCULATING PUBLISHED AVOIDED)	
COST RATES)	

Idaho Winds LLC ("Idaho Winds") hereby petitions the Idaho Public Utilities Commission ("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, Idaho Winds states as follows:

1. The name and address of Intervener is:

Idaho Winds LLC
c/o: Rick Koebbe, President
5420 W. Wicher Road
Glenns Ferry, Idaho 83623
208.853.4602
rk@powerworks.com

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

2. Idaho Winds owns the 22 MW Sawtooth wind farm development in Elmore County, Idaho ("Sawtooth"). Sawtooth is a Qualifying Facility ("QF") pursuant to the Public Utility Regulatory Act of 1978 ("PURPA").

3. Idaho Winds claims a direct and substantial interest in this proceeding, because the electrical output from Sawtooth is sold to Idaho Power, subject to a Firm Energy Sales Agreement ("FESA") with Idaho Power, and the 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 "curtailment," could substantially affect the rights and obligations of Idaho Winds.

4. Idaho Winds acknowledges that this petition is filed after the deadline for petitions to intervene. Idaho Winds has good cause for its late filing and substantial reason for delay. Idaho Winds only recently learned that proposals, including Idaho Power's proposed Schedule 74, may apply retroactively to existing contracts affecting Idaho Winds' FESA. Idaho Winds did not realize that the nature of this hearing could result in a new curtailment tariff to existing agreements. The threat of retroactive modification of its existing FESA compromises Idaho Winds' and Sawtooth's financial futures. Since this proceeding is likely to have an impact on Idaho Winds, very good cause exists to grant this petition, and Idaho Winds should be permitted to intervene.

5. Idaho Winds intervention will not disrupt or prejudice existing parties or unduly broaden the issues beyond those already listed in IPUC Order No. 32352 issued in this docket. Idaho Winds agrees to be bound by all scheduling orders existing on this docket prior to this intervention. Idaho Winds understands it does not have the right to introduce testimony in this proceeding, and does not intend to participate in the technical hearing scheduled for August 7-9, 2012, however Idaho Winds does wish to be on the service list for this docket and wishes to

retain the right to participate as a party following the technical hearing in any future proceedings to assert its interests in this matter.

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

DATED this 2nd day of August 2012.

Idaho Winds LLC



By:

Rick Koebbe
President

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2nd day of August, 2012, a true and correct copy of the within and foregoing PETITION TO INTERVENE of IDAHO WINDS LLC was served as shown to:

Original plus 7 copies hand delivered to:

Idaho Public Utilities Commission

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington
P.O. Box 83720
Boise, ID 83720
jean.jewell@ipuc.idaho.gov

Service copies sent via electronic mail to:

COMMISSION STAFF

Donald Howell
Kris Sasser
Idaho Public Utilities Commission
472 West Washington
PO Box 83720
Boise, ID 83720
don.howell@puc.idaho.gov
kris.sasser@puc.idaho.gov

IDAHO POWER COMPANY

Donovan E. Walker
Lisa D. Nordstrom
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
dwalker@idahopower.com
lnordstrom@idahopower.com

AVISTA CORPORATION

Michael G. Andrea
Avista Corporation
1411 E. Mission Ave.
Spokane, WA 99220
michael.andrea@avistacorp.com

Ken Kaufman
Lovinger Kaufman LLP
825 NE Multnomah, Suite 925
Portland, OR 97232
kaufman@lklaw.com

PACIFICCORP, dba ROCKY MOUNTAIN
POWER

Daniel Solander
PacifiCorp/ dba Rocky Mountain Power
201 S. Main St. Suite 2300
Salt Lake City, UT 84111
daniel.solander@pacificorp.com

THE NORTHWEST AND INTERMOUNTAIN
POWER PRODUCERS COALITION

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
PO Box 7218
Boise, ID 83702
peter@richardsonandoleary.com
greg@richardsonandoleary.com

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

J.R. SIMPLOT COMPANY

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
PO Box 7218
Boise, ID 83702
peter@richardsonandoleary.com
greg@richardsonandoleary.com

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

GRAND VIEW SOLAR II

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
PO Box 7218
Boise, ID 83702
peter@richardsonandoleary.com
greg@richardsonandoleary.com

Robert A. Paul
Grand View Solar II
15690 Vista Circle,
Desert Hot Springs, CA 92241
robertapaul08@gmail.com

RENEWABLE ENERGY COALITION

Ronald Williams
Williams Bradbury, P.C.
1015 W. Hays St.
Boise, ID 83702
ron@williamsbradbury.com

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

INTERCONNECT SOLAR DEVELOPMENT, LLC

R. Greg Ferney
Mimura Law Offices, PLLC
2176 E. Franklin Rd., Suite 120
Meridian, ID 83642
greg@mimuralaw.com

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

DYNAMIS ENERGY, LLC

Ronald L. Williams
Williams Bradbury, P.C.
1015 W. Hays Street
Boise, ID 83702
ron@williamsbradbury.com

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

NORTH SIDE CANAL COMPANY
TWIN FALLS CANAL COMPANY

C. Thomas Arkoosh
Capitol Law Group, PLLC
205 N. 10th St. 4th Floor
PO Box 2598
Boise, ID 83701
tarkoosh@capitollawgroup.com

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

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

Don Schoenbeck

RCS
dws@r-c-s-inc.com

Lori Thomas
Capitol Law Group, PLLC
lthomas@capitollawgroup.com

THE BOARD OF COUNTY COMMISSIONERS
OF ADAMS COUNTY, IDAHO

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
PO Box 7218
Boise, ID 83702
peter@richardsonandoleary.com
greg@richardsonandoleary.com

Bill Brown, Chair
Board of Commissioners
of Adams County, ID
PO Box 48
Council, ID 83612
bdbrown@frontiernet.net

BIRCH POWER COMPANY

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

IDAHO WINDFARMS, LLC

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

Dean J. Miller
McDevitt & Miller, LLP
420 W. Bannock St. (83702)

PO Box 2564
Boise, ID 83701
joe@mcdevitt-miller.com

BLUE RIBBON ENERGY LLC

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

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

RENEWABLE NORTHWEST PROJECT:

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

Megan Walseth Decker
Senior Staff Counsel
Renewable Northwest Project
917 SW Oak Street, Suite 303
Portland, OR 97205
E-mail: megan@rnp.org

IDAHO CONSERVATION LEAGUE

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

SNAKE RIVER ALLIANCE

Ken Miller

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

CLEARWATER PAPER CORPORATION

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
PO Box 7218
Boise, ID 83702
peter@richardsonandoleary.com
greg@richardsonandoleary.com

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

ENERGY INTEGRITY PROJECT

Tauna Christensen
769N 1100 E
Shelley, Idaho 83274
tauna@energyintegrityproject.org

IDAHO WIND PARTNERS I, LLC

Deborah E. Nelson
Kelsey J. Nunez
GIVENS PURSLEY LLP
601 W. Bannock Street
PO Box 2720
Boise, ID 83701-2720
den@givenspursley.com
kjn@givenspursley.com

RIDGELINE ENERGY, LLC

Dean J. Miller
Chas. F. McDevitt
McDEVITT & MILLER LLP

420 West Bannock Street
PO Box 2564-83701
Boise, ID 83702
joe@mcdevitt-miller.com
chas@mcdevitt-miller.com

EXERGY DEVELOPMENT GROUP OF IDAHO, LLC:

Gregory M. Adams
Peter J. Richardson
Richardson & O'Leary, PLLC
PO Box 7218
Boise, ID 83702
peter@richardsonandoleary.com
greg@richardsonandoleary.com

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

Dr. Don Reading
6070 Hill Road
Boise, ID 83703
dreading@mindspring.com

MOUNTAIN AIR PROJECTS, LLC

J. Kahle Becker
The Alaska Center
1020 W. Main St., Suite 400
Boise, ID 83702
kahle@kahlebeckerlaw.com

Michael J. Uda
Uda Law Firm, P.C.
7 W. 6th Avenue, Suite 4E
Helena, MT 59601
muda@mthelena.com

**BIG WOOD CANAL COMPANY C.
AMERICAN FALLS RESERVOIR DIST NO.2**

Thomas Arkoosh

Capitol Law Group, PLLC
205 N. 10th St., 4th Floor
PO Box 2598
Boise, ID 83701
tarkoosh@capitolawgroup.com



Rick Koebbe