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Attorney for Petitioner
Community Action Partnership
Association of Idaho and
American Association of
Retired Persons.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	CASE NO. IPC-E-03-13
IDAHO POWER COMPANY FOR AUTHORITY)	PETITION TO INTERVENE
TO INCREASE ITS INTERIM AND BASE)	OF COMMUNITY ACTION
RATES AND CHARGES FOR ELECTRIC)	PARTNERSHIP ASSOCIATION
SERVICE)	OF IDAHO AND
)	AMERICAN ASSOCIATION
)	OF RETIRED PERSONS
)	
_____)	

COMES NOW, Community Action Partnership Association of Idaho (hereinafter "CAP" or "Intervenor") and the American Association of Retired Persons (hereinafter "AARP" or "Intervenor") and, pursuant to Rules 071-075 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-075, and pursuant to that Notice of Intervention Deadline issued by this Commission on October 28, 2003, hereby petition the Commission for leave to intervene in this proceeding and to appear and participate with full parties' rights. CAP, and AARP, in support of this Petition, states as follows:

1. The addresses and names of the respective Intervenors is:

- A. Community Action Partnership Association of Idaho
P.O. Box 8224
Boise, ID. 83707

PETITION TO INTERVENE OF COMMUNITY ACTION PARTNERSHIP
ASSOCIATION OF IDAHO and AMERICAN ASSOCIATION OF RETIRED
PERSONS

B. American Association of Retired Persons:
5400 Franklin Rd.
Boise, ID. 83705

2. These Intervenors will be represented in this proceeding by:

Brad M. Purdy
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208-384-1299
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Email:

Michael Karp
147 Appaloosa Lane
Bellingham, WA. 98229
Phone 360-724-3215
FAX: 360-724-5272
Email: michael@awish.net

Copies of all pleadings, production requests, responses, Commission Orders and Notices and other documents should be provided to Brad M. Purdy and Michael Karp.

3. CAP is a non-profit corporation consisting of six community action agencies serving every county in Idaho and also includes, among others, the statewide Idaho Migrant Council and fights the causes and conditions of poverty through building the capacity and effectiveness of its members who have a direct and substantial interest in this proceeding. These causes and conditions of poverty include high utility costs for Idaho Power's low income rate payers. Low income families pay a higher percentage of their income for utility expenses than those in other economic categories. These conditions are often caused by living in sub-standard or older housing that is not energy efficient. Weatherization offers energy efficient retrofits for homes owned by low-

income rate payers (at 150% poverty level). Currently, weatherization programs in Idaho have as much as a six year backlog of customers needing the service.

CAP, if allowed intervention, will address the current levels of funding in Idaho Power's Low Income Weatherization Program as well as numerous other issues related to low income ratepayers, including the proposed increase in Idaho Power's basic monthly charge and how that increase disproportionately affects low income ratepayers.

4. CAP intends to participate in this proceeding as a party and introduce testimony and exhibits, cross-examine other witnesses, engage in oral argument and otherwise fully participate as a party.

5. AARP is a non-profit membership organization dedicated to addressing the needs of persons 50 or older. AARP serves over 35 million members, more than 150,000 of whom live in Idaho. Through information and education, advocacy and service, AARP seeks to enhance the quality of life for all its members. It does so by providing quality information and education, as well as through legislative, legal and consumer advocacy at the national and state level. AARP Idaho is an extension of the parent AARP organization and has an office and full-time staff at the address listed herein.

AARP supports state utility regulators in their efforts to provide high quality and non-discriminatory electric utility service at reasonable rates. AARP's members have a direct and substantial interest in this proceeding. Older Americans, particularly those on fixed incomes, are particularly vulnerable to rapid increases in energy prices or to unnecessary volatility in those prices. Retired, low-income households spend an average of 16 percent of their income on residential energy bills

AARP traditionally intervenes in state electric utility rate cases to foster the lowest possible rates consistent with high quality services, innovative programs, and financial stability. In this proceeding, AARP will present expert testimony on numerous issues related to overall revenue requirement, residential revenue allocation and rate design.

6. Though represented by one legal counsel, and though intervention is sought through this single pleading, CAP and AARP seek intervention status as separate intervenors. Their respective issues of concern and perspectives are distinct and they will make their best effort to avoid any unnecessary redundancy in the presentation of evidence and their general participation in this proceeding.

WHEREFORE, the Community Action Partnership of Idaho and the American Association of Retired Persons hereby request that this Commission grant their respective Petitions to Intervene in this proceeding and to fully appear and participate as a party with all the attendant rights and responsibilities.

DATED, this 12th day of November, 2003.


Brad M. Purdy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12th day of November, 2003, I caused to be served the foregoing PETITION TO INTERVENE OF COMMUNITY ACTION PARTNERSHIP ASSOCIATION OF IDAHO and the AMERICAN ASSOCIATION OF RETIRED PERSONS on the following, in the manner indicated.

Barton L. Kline	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid
Monica B. Moen	<input type="checkbox"/> Hand delivered
Idaho Power Company	<input checked="" type="checkbox"/> Facsimile
P.O. Box 70	<input type="checkbox"/> Overnight mail
Boise, ID. 83707	
Gregory W. Said	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid
Idaho Power Company	<input type="checkbox"/> Hand delivered
P.O. Box 70	<input type="checkbox"/> Facsimile
Boise, ID. 83707	<input type="checkbox"/> Overnight mail
Lisa Nordstrom	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid
Deputy Attorney General	<input type="checkbox"/> Hand delivered
Idaho Public Utilities Commission	<input checked="" type="checkbox"/> Facsimile
472 W. Washington St.	<input type="checkbox"/> Overnight mail
Boise, ID. 83702	
Peter J. Richardson	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid
Richardson & O'Leary	<input type="checkbox"/> Hand delivered
99 East State Street, Suite 200	<input checked="" type="checkbox"/> Facsimile
P.O. Box 1849	<input type="checkbox"/> Overnight mail
Eagle, ID. 83616	
Don Reading	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid
Ben Johnson Associates	<input type="checkbox"/> Hand delivered
6070 Hill Rd.	<input type="checkbox"/> Facsimile
Boise, ID. 83703	<input type="checkbox"/> Overnight mail