

ORIGINAL

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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for United Water Idaho Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE
APPLICATION OF THE IDAHO POWER
COMPANY FOR AUTHORITY TO
INCREASE ITS INTERIM AND BASE
RATES AND CHARGES FOR ELECTRIC
SERVICE

Case No. IPC-E-03-13

PETITION TO INTERVENE

COMES NOW United Water Idaho Inc. (United Water), and pursuant to this Commission's Rule of Practice and Procedure, Rule 071, IDAPA 31.10.01074, and pursuant to that Notice of Application, Notice of Intervention Deadline, Notice of Oral Argument and Notice of Prehearing Conference in Order No. 29369 issued on October 28, 2003, 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:

The name and address of this Intervenor is:

United Water Idaho Inc.
P.O. Box 190420
Boise, Idaho 83719-0420
Tel: 362-7337
Fax: 362-7069
Email: jerry.healy@unitedwater.com

This Intervenor will be represented herein by:

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and

Jeremiah J. Healy
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Copies of all pleadings, production requests, production responses, Commission Orders and other documents should be provided to Dean Miller and Jeremiah Healy as noted above.

United Water is a corporation authorized to do business in the state of Idaho. It provides potable water service, under rates established by the Commission, to approximately 74,000 customers, all within Idaho Power's service area. In order to operate its electric motors for supply, boosting and distribution purposes, United Water purchases significant quantities of electric power, primarily under Idaho Power's Tariff Schedule 9 Large General Service and Primary Service. For the most recent calendar year ending December 31, 2002 United Water spent over \$1.8 million on energy purchases from Idaho Power, utilizing 35 million kwh at 124 separate electric service points of delivery. Accordingly, United Water has a direct and substantial interest in this proceeding.

United Water 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 United Water will introduce is dependent upon the nature and effect of other evidence in this proceeding.

WHEREFORE, United Water 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 10th day of November, 2003.

MCDEVITT & MILLER LLP

A handwritten signature in black ink, appearing to read 'D. Miller', written over a horizontal line.

Dean J. Miller

Attorneys for United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of November, 2003, a true and correct copy of the foregoing *Petition to Intervene*, was served, by the method(s) indicated below, upon the following:

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