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Attorneys for the Industrial Customers of Idaho Power

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Idaho Public
UTILITIES COMMISSION

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE INVESTIGATION)
OF FINANCIAL DISINCENTIVES TO)
INVESTMENT IN ENERGY EFFICIENCY BY)
IDAHO POWER COMPANY)

CASE NO. IPC-E-04-15

PETITION TO INTERVENE

COMES NOW, The Industrial Customers of Idaho Power, hereinafter referred to as
"Intervenor," and pursuant to that NOTICE OF APPLICATION filed on March 6, 2006 and 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:

Industrial Customers of Idaho Power
c/o Peter J. Richardson
Richardson & O'Leary
515 N. 27th St
P.O. Box 7218
Boise, Idaho 83702
Telephone: (208) 938-7901
Fax: (208) 938-7904

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Peter J. Richardson as noted above and to:

Dr. Don Reading
6070 Hill Road
Boise, Idaho 83703
(208) 342-1700 Tel
(208) 383-0401 Fax
dreading@mindspring.com

2. This Intervenor, the Industrial Customers of Idaho Power, (“ICIP”) is an unincorporated association of Schedule 19 customers of Idaho Power. All ICIP members receive electric utility services from Idaho Power Company. The ICIP claims a direct and substantial interest in this proceeding in that the appropriate methodology for setting rates for service from Idaho Power Company may be affected by the outcome of this proceeding. Although this proceeding only directly affects the residential and commercial classes, its stated purpose is to evaluate a “new mechanism” for setting rates, including someday, possibly, the industrial class.

3. This Intervenor, in its capacity as a representative of industrial customers 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. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on the methodology this Commission uses to set electric rates.

6. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

WHEREFORE, the Industrial Customers of Idaho Power 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 14th day of March 2006.

Richardson & O'Leary, PLLC

By 

Peter J. Richardson
Industrial Customers of Idaho Power

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of March 2006, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE INDUSTRIAL CUSTOMERS OF IDAHO POWER, was sent via U.S Postal Service, postage prepaid, to the following parties:

Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 West Washington
Boise, Idaho 83702
jjewell@puc.state.id.us

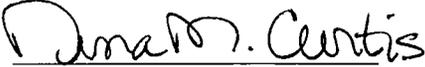
- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- Facsimile
- Electronic Mail

Barton Kline
Monica Moen
Idaho Power Company
PO Box 70
Boise, Idaho 83707-0070

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- Facsimile
- Electronic Mail

John R. Gale
Vice President Regulatory Affairs
Idaho Power Company
PO Box 70
Boise, Idaho 83707-0070

- U.S. Mail, Postage Prepaid
- Hand Delivered
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Nina M. Curtis