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IDAHO PUBLIC
UTILITIES COMMISSION

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Attorney for J. R. Simplot Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF IDAHO)
POWER COMPANY FOR AN ORDER)
TEMPORARILY SUSPENDING IDAHO)
POWER'S PURPA OBLIGATIONS TO ENTER)
INTO CONTRACTS TO PURCHASE ENERGY)
GENERATED BY WIND-POWERED SMALL)
POWER PRODUCTION FACILITIES)
_____)

CASE NO. IPC-E-05-22
PETITION OF
J. R. SIMPLOT COMPANY
FOR LEAVE TO
INTERVENE AND COMMENTS

I. PETITION TO INTERVENE

COMES NOW, the J. R. Simplot Company, a corporation duly authorized to conduct business in the state of Idaho, hereinafter referred to as "Intervenor", and pursuant to the Notice of Petition/Notice of Intervention Deadline/Notice of Procedural Conference in this matter issued on July 1, 2005 and pursuant to this Commission's Rules of Procedure, Rule 071, IDAPA 31.01.01074, 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 Intervenor is:

J. R. Simplot Company
Attn: David Hawk
Director, Energy Natural Resources
999 Main Street
P. O. Box 27
Boise, Idaho 83702
(208) 389-7306
(208) 389-7333 telefax
E-Mail: dhawk@simplot.com

Intervenor will be represented herein by:

R. Scott Pasley
Assistant General Counsel
J. R. Simplot Company
999 Main Street
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(208) 389-7464 telefax
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Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to David Hawk and R. Scott Pasley as noted above.

2. This Intervenor, the J. R. Simplot Company, is a Nevada corporation duly authorized to conduct business in the state of Idaho.

3. This Intervenor is directly and substantially interested in the above-captioned proceeding in that it is both an industrial customer of Idaho Power and a vendor of PURPA qualifying electric power to Idaho Power.

4. This Intervenor 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 manner or means of participating in the lawful determination of issues raised by the Commission in its Notice of Application.

II. COMMENT OF J. R. SIMPLOT COMPANY

As recently as three years ago, the Commission, without opposition, suspended avoided cost rates pending an expedited hearing on the price of natural gas for the surrogate avoided resources. Simplot believes that as precedence the Commission has the authority to suspend the PURPA wind proposal acceptance for a very brief period of time pending resolution of the concerns raised by Idaho Power.

Simplot was a very active participant in the creation and acceptance of the 2004 Idaho Power Integrated Resource Plan. Simplot fully supported the assemblage of a diversified group of generating resources to meet the growing peak and baseload demands of Idaho Power. Simplot adamantly opposed the continuing construction of base load combined cycle natural gas projects.

As a part of the diversified portfolio, 350 gross megawatts of wind energy was accepted. While it was generally believed that resource would be brought on line through the "Request for Proposal" process, that, however, was never decided.

There are significant ancillary issues associated with the acceptance of wind resources. At this time, Simplot does not believe Idaho Power is prepared to accept, shape and transmit 300 +/- gross megawatts of PURPA wind and another 350 gross megawatts of RFP wind.

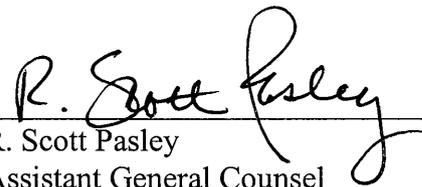
Simplot would be very disingenuous to suggest that the acceptance and pricing of PURPA, QF projects should be changed. Simplot, therefore, is willing to accept 350 gross (100 average) megawatts over three to four years through the PURPA process. If at the end of that period, 350 acceptable gross megawatts has not been contracted, Idaho Power should utilize an RFP for the balance. Developers need to voluntarily schedule their projects to lessen impact and preserve the integrity of the PURPA opportunity for other resources.

There is a reasonable middle ground that protects the concepts of resource diversity, clean and renewable, and overdue impact to the Idaho Power grid and scheduling requirements. It is Simplot's suggestion that the parties move expeditiously to seek this middle ground with the intervenors, staff and investor owned utilities. Simplot suggests a workshop approach with the results brought to the Commission posthaste.

WHEREFORE, the J. R. Simplot Company requests that this Commission grant this 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 at Boise, Idaho this 15th day of July, 2005.

Respectfully submitted,

By: 
R. Scott Pasley
Assistant General Counsel
J. R. Simplot Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 15th day of July, 2005, served the foregoing Petition to Intervene by the J. R. Simplot Company upon all parties of record in this proceedings, by mailing a copy thereof, properly addressed with postage prepaid, to:

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