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IDAHO PUBLIC  
UTILITIES COMMISSION

31 January 2006

Ms. Jean Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
P O Box 83720  
Boise ID 83720-0074

RE: **Case No. IPC-E-05-26**

Dear Ms. Jewell:

Enclosed please find an original and seven (7) copies of the **PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF IDAHO POWER** in the above case

I have also enclosed an extra copy to be service-dated and returned to us for our files. Thank you.

Sincerely,

Nina Curtis  
Administrative Assistant

encl.

Idaho Public Utilities Commission  
Office of the Secretary  
RECEIVED

JAN 31 2006

Boise, Idaho

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ISB No. 3195  
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Boise, Idaho 83702  
Telephone: (208) 938-7901 Tel  
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peter@richardsonandoleary.com  
Attorneys for the Industrial Customers of Idaho Power

BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE INVESTIGATION )  
OF APPROPRIATE RATE MAKING )  
TREATMENT OF IDAHO POWER )  
COMPANY'S SO2 ALLOWANCE SALE )  
PROCEEDS )

CASE NO. IPC-E-05-26

PETITION TO INTERVENE  
OF THE INDUSTRIAL CUSTOMERS  
OF IDAHO POWER

COMES NOW, The Industrial Customers of Idaho Power, hereinafter referred to as  
"Intervenor," and pursuant to that Notice of Application and Notice of Intervention Deadline  
issued on January 12, 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. 27<sup>th</sup> 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 their rates for service from Idaho Power Company may be affected by the outcome of this proceeding.

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 its electric rates and terms and conditions of service.

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 31st day of January 2006.

Richardson & O'Leary, LLP

By   
\_\_\_\_\_  
Peter J. Richardson  
Industrial Customers of Idaho Power

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 31<sup>st</sup> day of January 2006, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE INDUSTRIAL CUSTOMERS OF IDAHO POWER, was served by U.S. Mail, postage prepaid, to:

Barton Kline  
Monica Moen  
Idaho Power Company  
PO Box 70  
Boise, Idaho 80707-0070

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

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Nina Curtis  
Administrative Assistant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 31<sup>st</sup> day of January, 2006, I caused a true and correct copy of the foregoing **PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF IDAHO POWER** to be served by the method indicated below, and addressed to the following:

Jean Jewell  
Idaho Public Utilities Commission  
472 West Washington Street  
Post Office Box 83720  
Boise, Idaho 83720-0074

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

Barton L. Kline  
Idaho Power Company  
PO Box 70  
Boise, Idaho 83707

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

Signed:   
Nina M. Curtis