WILLIAMS · BRADBURY

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ATTORNEYS

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LAW

May 15, 2006

Idaho Public Utilities Commission Attention: Jean Jewell, Secretary PO Box 83720 Boise, ID 83720-0074

RE: Case #s IPC-E-06-09

Dear Jean:

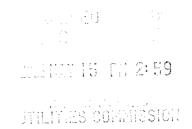
Enclosed please find the original and seven copies of the Petition to Intervene of Mountain View Power, Inc. in the above-referenced case. I will appreciate it if you will file this petition with the Commission.

Thank you for your courtesy. If you have any questions please feel free to contact me.

Sincerely, Ran William

Ronald L. Williams Attorney at Law

RLW/pmk Encl. cc: service list Ronald L. Williams ISB 3034 Williams Bradbury, P.C. PO Box 2128 Boise, Idaho 83701-2128 Telephone: (208) 344-6633 Telecopier: (208) 344-0077



Attorney for Mountain View Power, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

)

IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY FOR A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE EVANDER ANDREWS POWER PLANT

CASE NO. IPC-E-06-09

PETITION TO INTERVENE OF MOUNTAIN VIEW POWER, INC.

I.

Mountain View Power, Inc. ("MVP" or "Intervenor") petitions the Idaho Public Utilities

Commission for permission to intervene in this proceeding pursuant to Commission Rule

71,, IDAPA 31.01.01.71 as an Intervenor with full-party status.

II.

Intervenor will be represented in this proceeding by the firm Williams Bradbury, P.C.

All pleadings, notices, orders, productions requests, responses and communications related

to this case should be provided to the following:

Ronald L. Williams Williams Bradbury, P.C. P. O Box 2128 Boise ID 83701 ron@williamsbradbury.com

Robert D. Looper President, Mountain View Power, Inc 1015 W. Hays Street Boise, ID 83702 <u>rlooper@spellc.com</u> Idaho Power witness Greg Said states in his pre-filed direct testimony that the total capital costs of the Siemens Westinghouse power plant proposal at the Evander Andrews ("EA") were higher than other competitive bids. (Said, DI, p. 20). MVP has reason to believe that it may have submitted the lowest cost bid to Idaho Power to construct the identical Siemens Westinghouse power plant for Idaho Power at the Boise City Gateway Industrial Park site ("Gateway"). Idaho Power witness Greg Said also testifies that the non-price factors of "permit status, land ownership/control, location and regulatory requirements and community support" allowed the EA site to move ahead of the other, more price competitive sites – i.e., the Gateway site.

IV.

Intervenor has a direct and substantial interest in this proceeding for the reason that MVP believes the non-price scoring attributes in the Idaho Power bid process may have been inappropriately biased against MVP. Intervenor believes there are important ratepayer ramifications to explore concerning Idaho Power's selection of a higher cost power plant site that it owns -- based on "non-price" factors -- when compared to potentially lower cost sites proposed to the Company by a third party.

V.

Intervenor requests that it be allowed to participate in these proceedings as a party; that it be allowed to introduce evidence, cross examine witnesses, call and examine witnesses, and be heard in argument on all issues that may come before the Commission in this proceeding.

WHEREFORE, Intervenor respectfully requests that the Commission grant this Petition to Intervene in these proceedings and to allow MVP to appear and participate in all Petition to Intervene of Mountain View Power, Inc. - 2

matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross examine witnesses, present argument and to otherwise fully participate in the proceedings.

DATED this $\underline{J\zeta}$ day of May, 2006.

Mountain View Power, Inc.

Ronald L. Williams Williams Bradbury, P.C.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the $\frac{15}{100}$ day of May, 2006, I served a true and correct copy of the within and foregoing document, via U.S. Mail, postage prepaid, upon all parties of record, and addressed to the following:

Barton L. Kline Monica B. Moen Attorneys for Idaho Power Company P.O. Box 70 Boise Idaho 83707-0070

James C. Miller Sr. Vice President, Generation Idaho Power Company P.O. Box 70 Boise Idaho 83707

ald I. William

Ronald L. Williams Williams Bradbury, P.C.