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IDAHO PUBLIC
UTILITIES COMMISSION

September 26, 2006

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

RE: **Case No. IPC-E-06-21**

Dear Ms. Jewell:

Enclosed please find an original and seven (7) copies of the PETITION OF EXERGY DEVELOPMENT GROUP OF IDAHO TO INTERVENE AND FOR LEAVE TO FILE REPLY COMMENTS 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.

Peter J. Richardson
Mark Thompson
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UTILITIES COMMISSION

Attorneys for Exergy Development Group of Idaho LLC

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

CASSIA WIND FARM LLC ET AL.)	CASE NO. IPC-E-06-21
)	
v.)	
)	
IDAHO POWER COMPANY)	PETITION OF EXERGY
)	DEVELOPMENT GROUP OF IDAHO
)	TO INTERVENE AND FOR LEAVE
)	TO FILE REPLY COMMENTS
)	
)	

COMES NOW, Exergy Development Group of Idaho LLC, hereinafter referred to as "Exergy," and pursuant to Rules 71 and 72 of this Commission's Rules of Procedure (IDAPA 31.01.01.71-72) hereby petitions the Commission for leave to intervene in the above-captioned case, and to appear and participate herein as a party, including the right to file reply comments.

As grounds therefore, Exergy states as follows:

1. The name and address of this Intervenor is:

Exergy Development Group of Idaho LLC
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

peter@richardsonandoleary.com

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:

Lawrence R. Lieb
Exergy Development Group of Idaho LLC
910 W. Main Street, Ste. 310
Boise, Idaho 83702
Telephone: (208) 336-9793
Fax: (208) 336-9431
lrlal@sbcglobal.net

Exergy is an Idaho limited liability company that develops and owns QF projects, which like Cassia Gulch Wind Park (“Cassia”), are among those requesting interconnection to Idaho Power’s transmission system in the Twin Falls, Idaho, area

3. The outcome of this proceeding may have a direct and material impact on the costs that Exergy is responsible for when selling power to Idaho Power as a Qualifying Facility (“QF”).

4. Without the opportunity to intervene herein, Exergy would be without any means of participation in this proceeding.

5. Granting Exergy’s petition to intervene will not unduly broaden the issues in this proceeding nor will it prejudice any party to this case.

6. Exergy understands that Cassia has requested that this proceeding be conducted under the Commission’s Rules of Modified Procedure, and that Cassia has proposed a schedule under which Idaho Power (and possibly other utilities) will have a 30-day comment period to file a responsive pleading, followed by a 14-day comment period for reply brief or memorandum. Exergy also understands that the Commission has determined to adopt Cassia’s proposed schedule, as well as its request that the proceeding be conducted pursuant to Modified Procedures.

7. Exergy supports Cassia's proposed schedule.

8. Exergy desires the opportunity to file reply brief or memorandum as set forth in the schedule adopted by the Commission and otherwise participate as a party.

WHEREFORE, Exergy respectfully requests that this Commission grant its Petition to Intervene in this proceeding, and its request to appear and participate in all matters as may be necessary and appropriate, including the opportunity to file reply comments in accordance with the schedule in this proceeding.

DATED this 26th day of September 2006.

By 

Peter Richardson

Attorneys for Exergy Development Group of Idaho LLC

I HEREBY CERTIFY that on the 17th day of May, 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

Cassia Wind Gulch Park LLC
Joe Miller
McDevitt & Miller
420 West Bannock
Boise, Idaho 83702

And hand-delivered to:

Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 West Washington
Boise, Idaho 83702



Nina Curtis
Administrative Assistan