



**RICHARDSON & O'LEARY, PLLC**  
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IDAHO PUBLIC  
UTILITIES COMMISSION

2 July 2008

Ms. Jean Jewell  
Secretary  
Idaho Public Utilities Commission  
472 W. Washington  
Boise, ID 83702

RE: **IPC-E-08-13**

Dear Ms. Jewell:

We are enclosing an original and seven (7) copies of the **PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF IDAHO POWER**, in the above case.

We have included a copy to be conformed by your office, as well.

Sincerely,

Nina M. Curtis  
Richardson & O'Leary PLLC

Peter J. Richardson  
ISB No. 3195  
Richardson & O'Leary  
515 N. 27<sup>th</sup> Street  
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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorneys for the Industrial Customers of Idaho Power

BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER )  
COMPANY' S APPLICATION FOR AN )  
ACCOUNTING ORDER AUTHORIZING )  
THE INCLUSION OF POWER SUPPLY )  
EXPENSES ASSOCIATED WITH THE )  
PURCHASE OF CAPACITY AND ENERGY )  
FROM PPL ENERGYPLUS, LLC IN THE )  
POWER COST ADJUSTMENT )

CASE NO. IPC-E-08-13

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 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  
[peter@richardsonandoleary.com](mailto: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:

Dr. Don Reading  
6070 Hill Road  
Boise, Idaho 83703  
(208) 342-1700 Tel  
(208) 384-1511 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 outcome will affect the company's power purchase costs which is likely to affect this intervenor's rates for service from Idaho Power Company.

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, submit comments, and fully participate in any hearing that may occur including the calling and cross examination of witnesses. 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 effective 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. Intervenor's acknowledge the Commission's Notice of Modified Procedure issued for this case on June 25, 2008.

**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 at any hearing that may occur, and to otherwise fully participate in these proceedings.

DATED this 2<sup>nd</sup> day of July 2008.

Richardson & O'Leary, LLP

By   
Peter J. Richardson  
Industrial Customers of Idaho Power

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 2<sup>nd</sup> day of July, 2008, 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:

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

Hand Delivery  
 U.S. Mail, postage pre-paid  
 Facsimile  
 Electronic Mail

John R. Gale  
Vice President, Regulatory Affairs  
Idaho Power Company  
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Nina Curtis  
Administrative Assistant