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IDAHO PUBLIC
UTILITIES COMMISSION

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Attorneys for Intervenor: City of Nampa

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
IDAHO POWER COMPANY FOR AUTHORITY)
TO MODIFY ITS RULE H LINE EXTENSION)
TARIFF RELATED TO NEW SERVICE)
ATTACHMENTS AND DISTRIBUTION LINE)
INSTALLATIONS)

CASE NO. IPC-E-08-22
PETITION TO INTERVENE

The CITY OF NAMPA hereby petitions to intervene in the above-captioned matter pursuant to Idaho Public Utilities Commission Rules of Procedure (IDAPA 31.01.01.000 et seq) and the Commission's November 26, 2008 *Notice of Application and Notice of Intervention Deadline*.

I. In support of this Petition, the City of Nampa alleges as follows:

1. The City of Nampa is duly organized as a municipal corporation of the State of Idaho under Idaho Code Title 50.

2. The City of Nampa owns, governs, and controls public roadways and right-of-ways within the City limits. Under Chapter 3 of Title 50 of the Idaho Code, the City of Nampa is empowered to supervise, regulate, create, widen, improve, and otherwise control and direct such public roadways.

3. The City of Nampa has a direct and substantial interest in the above captioned matter. Nampa's responsibilities for its roadways include maintenance and improvements that require relocation of Idaho Power facilities so that such facilities do not interfere with transportation and public safety. Idaho Power's *Application* seeks to change the relocation rules so that the costs of such relocation would be borne by the City and local improvement districts organized by the City. The City of Nampa is substantially interested in making sure that relocation costs are not unfairly imposed on the City. Additionally the City has a direct interest in making sure such rule changes do not contravene the franchise agreement between the City and Idaho Power. The City also has an interest in making sure that such rule changes do not contravene Idaho statutes and case law.

4. Intervention by the City of Nampa will not unduly broaden the issues in this matter. The City's concerns relate primarily to the proposed changes regarding the definition of third-party beneficiaries, the treatment of local improvement districts, and allocation of relocation costs. The City does not seek to introduce additional issues or matters beyond those already included in the proposed rule change.

5. Intervention by the City of Nampa is in the public interest. The City has comments and concerns related to the public interest in traffic and roadways.

6. Intervention by the City of Nampa will not cause delay or prejudice to the parties in the above-captioned matter. The City of Nampa seeks to timely intervene at an early stage in this matter and within fourteen (14) days of the service date of *PUC Order No. 30687*.

7. Intervention by the City of Nampa is appropriate to allow the City of Nampa to appropriately express certain concerns, objections, and protests in relation to the Application in this matter.

8. The City of Nampa wishes to maintain good relations with Idaho Power and believes that status as an intervenor will allow for clearer communications about concerns and issues.

Dated this 10th day of December, 2008.

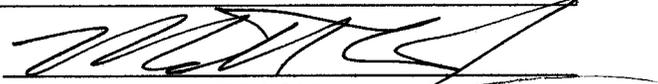
WHITE PETERSON

By: 
 Matthew A. Johnson
Attorneys for the City of Nampa

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 10th day of December, 2008, a true and correct copy of the above and foregoing instrument was served upon the following by the method indicated below:

Michael Fuss City of Nampa 411 - 3 rd Street South Nampa, ID 83651	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile:
Lisa D. Nordstrom Barton L. Kline IDAHO POWER COMPANY P. O. Box 70 Boise, ID 83707	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile:


 for WHITE PETERSON