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 Community Action Partnership
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 IDAHO PUBLIC
 UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	CASE NO. IPC-E-09-03
COMPANY'S APPLICATION FOR A)	
CERTIFICATE OF PUBLIC)	COMMUNITY ACTION PARTNER-
CONVENIENCE AND NECESSITY FOR)	SHIP ASSOCIATION OF IDAHO'S
THE LANGLEY GULCH POWER PLANT)	LATE FILED PETITION FOR
)	INTERVENTION

COMES NOW, Community Action Partnership Association of Idaho (hereinafter "CAPAI" or "Intervenor") and, pursuant to Rules 071-075 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-075, hereby petitions the Commission for leave to intervene in this proceeding and to appear and participate with full party's rights. In support of this Petition, CAPAI states as follows:

1. The address and name of the Petitioner is:

Community Action Partnership Association of Idaho
 5400 W. Franklin Rd., Suite G
 Boise, ID. 83705

2. This Intervenor will be represented in this proceeding by, and pleadings and other correspondence need only be sent to:

Brad M. Purdy
 Attorney at Law

2019 N. 17th St.
Boise, ID. 83702
208-384-1299
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3. CAPAI is a non-profit corporation consisting of six community action agencies serving every county in Idaho and also includes, among others, the statewide Community Council of Idaho (formerly the Idaho Migrant Council) and fights the causes and conditions of poverty through building the capacity and effectiveness of its members who have a direct and substantial interest in this proceeding. These causes and conditions of poverty include high utility costs for Idaho Power's low income rate payers. Low income families pay a higher percentage of their income for utility expenses than those in other economic categories. These conditions are often caused by living in sub-standard or older housing that is not energy efficient. CAPAI is the only party who typically intervenes in proceedings before the Commission; specifically representing public utilities' low-income customers. Consequently, it is fair to say that CAPAI has filled an important role that long stood vacant. CAPAI believes that it fulfills an important role in this, and similar proceedings, and without the opportunity to participate as a party in this proceeding, would be unable to fulfill that role.

4. CAPAI respectfully requests the right to participate in this proceeding as a party and introduce testimony and exhibits, cross-examine other witnesses, engage in oral argument, file comments, and otherwise fully participate as a party.

5. Pursuant to Commission Notice, the intervention deadline for this case was scheduled for April 1, 2009. CAPAI offers the following reason for its late filed Petition. This case was filed on the heels of the 2009 legislative session during which CAPAI devoted the vast majority of its

available time and resources in an attempt to seek the passage of low-income bill payment legislation, as promoted by this Commission in Order No. 30724, Case No.GNR-U-08-01. In addition, CAPAI has recently been and is a party to the most recent AVISTA and Rocky Mountain Power rate cases.

Due to budgetary constraints, CAPAI did not timely file a Petition to Intervene in this case pursuant to the Commission's Notice of Scheduling. CAPAI is now able to become involved and, upon analysis of the Application in this case, the rate basing treatment that Idaho Power seeks, the significant rate impact that the Langley Gulch plant will have, and, finally, the fact that low-income customers do not have a voice in this case, CAPAI believes it appropriate to seek intervention. CAPAI consistently strives to meet all Commission established deadlines in every case CAPAI is a party to. CAPAI fully recognizes the degree to which this Petition is untimely but submits that if it were allowed intervenor status, it would not unduly broaden the scope of the case or cause unfair prejudice to the Company or any other party. Furthermore, CAPAI offers the assurance that it will not file any motions or seek any relief from the Commission that would result in backtracking or stalling of the progress of this case. CAPAI also assures the Commission that, if granted intervention, it will strictly adhere to all future deadlines.

WHEREFORE, the Community Action Partnership Association of Idaho hereby requests that this Commission grant its Petition to Intervene in this proceeding and to fully appear and participate as a party with all the attendant rights and responsibilities. CAPAI appreciates the Commission's consideration of this Petition.

DATED, this 1st day of June, 2009.

A handwritten signature in black ink, appearing to read "Brad M. Purdy", is written over a horizontal line. The signature is stylized and cursive.

Brad M. Purdy

CERTIFICATE OF SERVICE

I hereby represent that on the 1st day of June, 2009, it has served the foregoing Petition to Intervene on the following parties via U.S. Postage and by electronic mail (where available).

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