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LOUIS F. RACINE (1917-2005)  
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January 4, 2011

**Hand Delivered**

Jean Jewell  
IPUC Commission Secretary  
P.O. Box 83720  
Boise, Idaho 83720-0074

**Re: IPC-E-10-46**

Dear Ms. Jewell:

Enclosed for filing please find an original and seven (7) copies of the Petition of Idaho Irrigation Pumpers Association, Inc. for Leave to Intervene.

Sincerely,



ERIC L. OLSEN

ELO/rg

Enclosures

c: Service List

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ORIGINAL

Eric L. Olsen, ISB No. 4811  
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Attorneys for Intervenor  
Idaho Irrigation Pumpers Association, Inc.

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY REQUESTING ) **CASE NO. IPC-E-10-46**  
APPROVAL OF REVISIONS TO THE )  
IRRIGATION PEAK REWARDS PROGRAM, )  
SCHEDULE 23 )  
\_\_\_\_\_ )

**PETITION OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC.,  
FOR LEAVE TO INTERVENE**

COMES NOW Idaho Irrigation Pumpers Association, Inc., herein called "this Intervenor"  
and pursuant to Rules 72 and 73 of the rules of Procedure of the Idaho Public Utility Commission,  
and by this Petition asks leave to intervene herein and to appear and participate as a party herein, and  
as basis therefor states as follows:

- (1) The name and address of this Intervenor is:  
  
Idaho Irrigation Pumpers Association, Inc.  
c/o Lynn Tominaga  
P.O. Box 2624  
Boise, Idaho 83701-2624

This Intervenor will be represented by:

Eric L. Olsen  
Racine, Olson, Nye, Budge &  
Bailey, Chartered  
P.O. Box 1391; 201 E. Center  
Pocatello, Idaho 83204-1391

and requests that copies of all pleadings and production requests and responses should be provided to the following:

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Racine, Olson, Nye, Budge &  
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Anthony Yankel  
29814 Lake Road  
Bay Village, Ohio 44140  
Fax: 440-808-1450  
E-mail: [tony@yankel.net](mailto:tony@yankel.net)

(2) This Intervenor and its members have a direct and substantial interest in this proceeding and intend to participate in all respects herein as a party as may be required to represent its interests.

(3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

WHEREFORE, this Intervenor requests that this Commission confirm this Intervenor's leave 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, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

DATED this \_\_\_\_\_ day of January, 2011.

RACINE, OLSON, NYE, BUDGE &  
BAILEY, CHARTERED

By *Eric L. Olsen for*  
ERIC L. OLSEN

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this \_\_\_\_ day of January, 2011, I served a true, correct and complete copy of the Petition of Idaho Irrigation Pumpers Association, Inc. For Leave to Intervene to each of the following, via U.S. Mail or private courier, e-mail or hand delivery, as indicated below:

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
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