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Attorneys for Charlie Wind LLC

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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO

PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)
APPLICATION OF IDAHO POWER)
COMPANY FOR A DETERMINATION)
REGARDING A FIRM ENERGY SALES)
AGREEMENT BETWEEN IDAHO)
POWER AND CHARLIE WIND, LLC)
_____)
CASE NO. IPC-E-10-53
PETITION TO INTERVENE OF
CHARLIE WIND LLC

COMES NOW, Charlie Wind LLC, 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:

1. The name and address of this Intervenor is:

Charlie Wind LLC
C/O Cotterel WindEnergy Center LLC
150 N. Dairy Ashford
Building C, Suite 356D
Houston, TX 77079

Copies of all filings, commission orders, and other documents should be provided to:

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2. This Intervenor, Charlie Wind LLC is a Delaware limited liability company, duly registered to conduct business in the State of Idaho. Charlie Wind LLC has the rights to develop and dispose of the output of the Charlie Wind LLC wind project, which is a qualifying facility under the Public Utility Regulatory Policies Act of 1978.

3. This Intervenor intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

4. Without the opportunity to intervene herein, this Intervenor would be without adequate means of participation in this proceeding which may have a material impact on its ability to exercise its rights under PURPA to contract with an electric utility, and to sell the output of its qualifying facility.

WHEREFORE, Charlie Wind LLC 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 and to otherwise fully participate in these proceedings.

DATED this 17th day of March, 2011.

RICHARDSON AND O'LEARY, PLLC

By:  _____

Peter J. Richardson
Gregory M. Adams
Attorneys for Charlie Wind LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of March, 2011, a true and correct copy of the within and foregoing **PETITION TO INTERVENE** was served as shown to the following parties:

Lisa Nordstrom
Donovan Walker
Idaho Power Company
PO Box 70
Boise, Idaho 83707
dwalker@idahopower.com
lnordstrom@idahopower.com

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- Facsimile
- Electronic Mail

Randy Allphin
Idaho Power Company
PO Box 70
Boise, ID 83707
rallphin@idahopower.com

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- Facsimile
- Electronic Mail

Signed



Gregory Adams