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**DONOVAN E. WALKER**  
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August 22, 2011

**VIA HAND DELIVERY**

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
Boise, Idaho 83702

Re: Case No. IPC-E-11-10  
*IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY  
FOR A DETERMINATION REGARDING THE FIRM ENERGY SALES  
AGREEMENT WITH INTERCONNECT SOLAR DEVELOPMENT, LLC,  
FOR THE SALE AND PURCHASE OF ELECTRIC ENERGY*

Dear Ms. Jewell:

Enclosed for filing please find an original and seven (7) copies of Idaho Power Company's Motion in Opposition to Grand View PV Solar Two's Petition to Intervene in the above matter.

Very truly yours,

Donovan E. Walker

DEW:csb  
Enclosures

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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorneys for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR A ) CASE NO. IPC-E-11-10  
DETERMINATION REGARDING THE )  
FIRM ENERGY SALES AGREEMENT ) IDAHO POWER COMPANY'S  
WITH INTERCONNECT SOLAR ) MOTION IN OPPOSITION TO  
DEVELOPMENT, LLC, FOR THE SALE ) GRAND VIEW PV SOLAR TWO'S  
AND PURCHASE OF ELECTRIC ) PETITION TO INTERVENE  
ENERGY. )  
\_\_\_\_\_ )

Idaho Power Company ("Idaho Power" or "Company"), pursuant to RP 75, hereby moves the Idaho Public Utilities Commission ("Commission") to issue an Order denying the Petition to Intervene filed by Grand View PV Solar Two, LLC ("Grand View Solar") in this proceeding.

In support of this Motion, Idaho Power states as follows:

1. On August 15, 2011, Grand View Solar filed a Petition to Intervene in Case No. IPC-E-11-10, as well as its First Production Requests to Idaho Power in that docket. Idaho Power hereby objects to the intervention of Grand View Solar in the present case, which asks for a Commission determination either approving or rejecting Interconnect Solar Development, LLC's ("Interconnect Solar") contract with Idaho

Power. This objection is filed pursuant to Rule 75, which states, "Any party opposing a petition to intervene must do so by motion in opposition filed within seven (7) days after receipt of the petition to intervene . . . ."

2. Grand View Solar's Petition should be denied because: (1) Grand View Solar has at least three other opportunities before this Commission with which to address its own issues; (2) Grand View Solar's involvement with this case will cause additional and costly delay, as well as unnecessary confusion of the issues; and (3) much of the information in this matter is confidential and proprietary, and it may be inappropriate for one of Interconnect Solar's competitors to gain access to such information.

3. As stated in its Petition to Intervene, Grand View Solar has its own draft power sales contract with Idaho Power. Grand View Solar has filed a Complaint (Case No. IPC-E-11-15) regarding the provision in that contract concerning the environmental attributes of the project. Grand View Solar has that forum available to it to address issues it may have with its own contract. Additionally, once a contract is executed between Grand View Solar and Idaho Power, Grand View Solar will have its own case before this Commission for a determination as to acceptance or rejection of said contract. Grand View Solar has a full and complete opportunity, within its own cases, to address any issues it deems relevant, and thus it is not necessary for it to do so in Interconnect Solar's case. Third, Grand View Solar has been a party to and is aware of the General Investigation docket that is proceeding before this Commission to address various issues regarding the Public Utility Regulatory Policies Act of 1978 and avoided cost related issues. In fact, the present phase of the Commission's investigation is designated for analyzing and exploring the Integrated Resource Plan and Surrogate

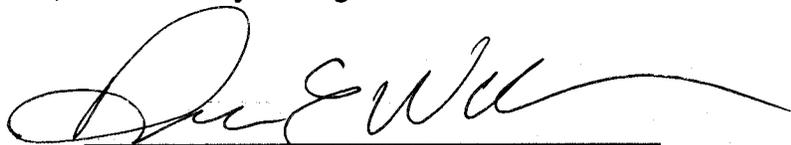
Avoidable Resource based avoided cost pricing methodologies, as well as other avoided cost issues. Consequently, Grand View Solar is not without means – other than intervening into a competitor’s contract review case – with which to address the issues it feels are relevant to its own contract with Idaho Power, and it is not necessary for it to intervene in Interconnect Solar’s case in order to be heard.

4. Grand View Solar’s involvement will cause unnecessary delay to the process and confusion of the issues. Interconnect Solar has all ready stated that the additional time that Staff has requested to investigate its contract and the related issues has put its project in jeopardy of surviving. Idaho Power is expediting its responses to Staff’s discovery requests and working with both Staff and Interconnect Solar to expedite the review and processing of the case. Grand View Solar, in addition to filing its Petition to Intervene, all ready filed a set of discovery requests. This alone, without even considering the substance of its production requests, introduces additional time and delay to the proceedings. Additionally, there are legitimate issues regarding the substance of Grand View Solar’s requests and the appropriateness of Grand View Solar’s access to the requested information. All of which introduce additional delay and issues into Interconnect Solar’s case.

**REQUEST FOR RELIEF**

WHEREFORE, Idaho Power respectfully requests that the Commission issue an Order denying Grand View Solar’s Petition to Intervene in this matter.

Respectfully submitted at Boise, Idaho, this 22<sup>nd</sup> day of August 2011.



DONOVAN E. WALKER  
Attorney for Idaho Power Company

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22<sup>nd</sup> day of August 2011 I served a true and correct copy of IDAHO POWER COMPANY'S MOTION IN OPPOSITION TO GRAND VIEW PV SOLAR TWO'S PETITION TO INTERVENE upon the following named parties by the method indicated below, and addressed to the following:

**Commission Staff**

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**Grand View PV Solar Two, LLC**

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