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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 THE FIRM)
ENERGY SALES AGREEMENT WITH)
INTERCONNECT SOLAR DEVELOPMENT,)
LLC, FOR THE SALE AND PURCHASE OF)
ELECTRIC ENERGY)

CASE NO. IPC-E-11-10
PETITION TO INTERVENE
OF GRAND VIEW PV SOLAR TWO

COMES NOW, Grand View PV Solar Two, 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 as follows:

1. The name and address of this Intervenor is:

Grand View PV Solar Two, LLC
Peter Richardson
515 N. 27th Street
Boise, Idaho 83702
peter@richardsonandoleary.com

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Peter Richardson as noted above and to:

Dr. Don Reading
6070 Hill Road
Boise, Idaho 83703
(208) 348-1700 Tel
(208) 383-0401 Fax
dreading@mindspring.com

If the parties utilize electronic service of document please then also include Mr. Robert Paul on the e-mail list at robertpaul08@gmail.com.

1. This Intervenor understands that discovery is currently taking place between the Staff of the Commission and Idaho Power that indicates changes in the manner in which Idaho Power calculates avoided cost rates for solar projects that are larger than 100 kw may be considered. Grand View PV Solar Two has a draft contract offer from Idaho Power with similar rates to those found in Interconnect Solar's pending contract for approval before this Commission

2. This Intervenor, Grand View Solar PV Two, LLC claims a direct and substantial interest in this proceeding in that it is also a developer of solar QF projects in Idaho and is interested and directly affected by the methodology used by Idaho Power in the determination of avoided cost rates for solar QFs larger than 100.

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.

5. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on the avoided cost rates contained in its proffered contract by Idaho Power.

6. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

7. Grand View PV Solar Two recognizes that the Commission has issued a Notice of Modified Procedure that did not invite petitions for intervention to be filed. The Commission subsequently modified the deadline in the Notice of Modified Procedure for comments to accommodate Staff's need for additional time to review the rates contained in Interconnect Solar's power purchase agreement. The new dates are September 29 for initial comments and October 6 for reply comments. Grand View Solar may file comments; however, without status as a party, Grand View Solar will not have access to, or rights of, discovery, including access to confidential Idaho Power models. Grand View PV Solar Two will adhere to the existing schedule and its participation as a party will not delay this proceeding nor broaden the issues herein.

WHEREFORE, Grand View PV Solar Two 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 15th day of August, 2011.

Peter Richardson

By 

Peter Richardson
Grand View PV Solar Two

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of August, 2011, a true and correct copy of the within and foregoing **PETITION TO INTERVENE BY GRAND VIEW PV SOLAR TWI** was served in the manner shown to:

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington (83702)
PO Box 83720
Boise, ID 83720-0074

Hand Delivery
 U.S. Mail, postage pre-paid
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Nina Curtis
Administrative Assistant