

LAW OFFICES OF

**RACINE OLSON NYE BUDGE & BAILEY
CHARTERED**

W. MARCUS W. NYE
RANDALL C. BUDGE
JOHN A. BAILEY, JR.
JOHN R. GOODELL
JOHN B. INGELSTROM
DANIEL C. GREEN
BRENT O. ROCHE
KIRK B. HADLEY
FRED J. LEWIS
ERIC L. OLSEN
CONRAD J. AIKEN
RICHARD A. HEARN, M.D.
LANE V. ERICKSON
FREDERICK J. HAHN, III
PATRICK N. GEORGE
SCOTT J. SMITH
JOSHUA D. JOHNSON
DAVID E. ALEXANDER
STEPHEN J. MUHONEN
CANDICE M. MCHUGH
CAROL TIPPI VOLYN
JONATHAN S. BYINGTON
JONATHAN M. VOLYN
THOMAS J. BUDGE
BRENT L. WHITING
DAVE BAGLEY
JASON E. FLAIG
FERRELL S. RYAN, III
AARON A. CRARY
JOHN J. BULGER
BRETT R. CAHOON
JEFFREY A. WARR

201 EAST CENTER STREET
POST OFFICE BOX 1391
POCATELLO, IDAHO 83204-1391

TELEPHONE (208) 232-6101
FACSIMILE (208) 232-6109

www.racinelaw.net

SENDER'S E-MAIL ADDRESS: elo@racinelaw.net

BOISE OFFICE
101 SOUTH CAPITOL
BOULEVARD, SUITE 300
BOISE, IDAHO 83702
TELEPHONE: (208) 395-0011
FACSIMILE: (208) 433-0167

IDAHO FALLS OFFICE
477 SHOUP AVENUE
SUITE 107
POST OFFICE BOX 50698
IDAHO FALLS, ID 83405
TELEPHONE: (208) 528-6101
FACSIMILE: (208) 528-6109

**ALL OFFICES TOLL FREE
(877) 232-6101**

LOUIS F. RACINE (1917-2005)
WILLIAM D. OLSON, OF COUNSEL

²⁹
March 28, 2012

Jean J. Jewell, Secretary
Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho 83720-0084

IPC-E-12-13
Re: Case No. ~~IPC 3-2012-13~~

Dear Mrs. Jewell:

Enclosed for filing in the captioned case please find the original and seven copies of *Petition of Idaho Irrigation Pumpers Association, Inc., for Leave to Intervene* and the original and three copies of *Idaho Irrigation Pumpers Association, Inc.'s First Data Requests to Idaho Power Company*. Thank you for your assistance.

Sincerely,

Eric Olsen by pub

ERIC L. OLSEN

ELO:rr

Enclosures

cc: Service List (Via Email)

RECEIVED
2012 MAR 30 AM 9:47
IDAHO PUBLIC
UTILITIES COMMISSION

RECEIVED

2012 MAR 30 AM 9:48

IDAHO PUBLIC UTILITIES COMMISSION

Eric L. Olsen, ISB No. 4811
RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED
P.O. Box 1391; 201 E. Center
Pocatello, Idaho 83204-1391
Telephone: (208) 232-6101
Fax: (208) 232-6109

Attorneys for Intervenor
Idaho Irrigation Pumpers Association, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER of IDAHO POWER)
COMPANY'S APPLICATION FOR)
AUTHORITY TO SHARE REVENUES WITH)
CUSTOMERS IN CONFORMANCE WITH)
ORDER NOS 30978 AND 32424.)
)
)
)
_____)

CASE NO. IPC-E-12-13

**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:

Eric L. Olsen
Racine, Olson, Nye, Budge &
Bailey, Chartered
P.O. Box 1391; 201 E. Center
Pocatello, Idaho 83204-1391
Telephone: (208) 232-6101
Fax: (208) 232-6109
E-mail: elo@racinelaw.net

Anthony Yankel
29814 Lake Road
Bay Village, Ohio 44140
Fax: 440-808-1450
E-mail: 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 29th day of March, 2012.

RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED

By Eric L. Olsen by PLS
ERIC L. OLSEN

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29 day of March, 2012, 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
P.O. Box 83720
472 W. Washington Street
Boise, Idaho 83720-0074
jjewell@puc.state.id.us

U.S. Mail/Postage Prepaid
 E-mail
 Facsimile
 Overnight Mail
 Hand Delivered

Lisa D. Nordstrom
Julia A. Hilton
Idaho Power Company
P.O. Box 70
Boise, ID 83707-0070
lnordstrom@idahopower.com
Jhilton@idahopower.com

U.S. Mail/Postage Prepaid
 E-mail
 Facsimile
 Overnight Mail
 Hand Delivered

Matt Larkin
Greg W. Said
Vice President, Regulatory Affairs
Idaho Power Company
P.O. Box 70
Boise, ID 83707-0071
gsaid@idahopower.com
mlarkin@idahopower.com

U.S. Mail/Postage Prepaid
 E-mail
 Facsimile
 Overnight Mail
 Hand Delivered

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
PO Box 7218
Boise, Idaho 83702
peter@richardsonandoleary.com
greg@richardsonandoleary.com

U.S. Mail/Postage Prepaid
 E-mail
 Facsimile
 Overnight Mail
 Hand Delivered

Dr. Don Reading
6070 Hill Road
Boise, ID 83703
Email: dreading@mindspring.com

- U.S. Mail/Postage Prepaid
- Email
- Facsimile
- Overnight Mail
- Hand Delivery

Thorvald A. Nelson
Frederick J. Schmidt
Sara K. Rundell
Brian T. Hanen
Pamela S. Howland
Holland & Hart, LLP
6380 S. Fiddlers Green Circle, Ste 500
Greenwood Village, CO 80111
Email: tnelson@hollandhart.com
Fschmidt@hollandhart.com
Srundell@hollandhart.com
Bhansen@hollandhart.com
Phowland@hollandhart.com
Ibuchanan@hollandhart.com

- U.S. Mail/Postage Prepaid
- Email
- Facsimile
- Overnight Mail
- Hand Delivery

Richard E. Malmgren
Micron Technology, Inc.
800 S. Federal Way
Boise, ID 83716
Email: remalmgren@micron.com

- U.S. Mail/Postage Prepaid
- Email
- Facsimile
- Overnight Mail
- Hand Delivery

Eric L. Olsen by RUB
ERIC L. OLSEN