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

January 7, 2013

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

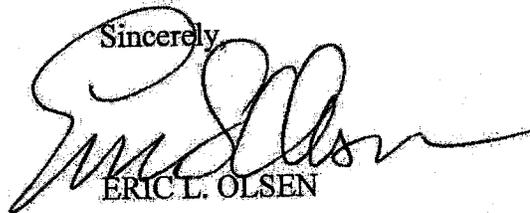
Re: *Case No. IPC-E-12-29*

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 PROTEST TO MODIFIED PROCEDURE AND DEMAND FOR HEARING**

Thank you for your assistance.

Sincerely,



ERIC L. OLSEN

ELO:tjl

Enclosures

c: Service List (Via Email)

RECEIVED
2013 JAN - 7 PM 3:02
IDAHO PUBLIC
UTILITIES COMMISSION

Eric L. Olsen (ISB#: 4811)
RACINE, OLSON, NYE,
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P.O. Box 1391
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2013 JAN -7 PM 3:02
IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Intervenor Idaho Irrigation Pumpers Association, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER
COMPANY'S REQUEST TO
TEMPORARILY SUSPEND THE A/C
COOL CREDIT AND IRRIGATION PEAK
REWARDS DEMAND RESPONSE
PROGRAMS

CASE NO. IPC-E-12-29

PETITION OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC.,

FOR LEAVE TO INTERVENE AND PROTEST TO MODIFIED PROCEDURE AND

DEMAND FOR HEARING

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.

(4) Pursuant to Rule 203, the Intervenor hereby protests the use of modified procedure to address the suspension of schedule 23. This load control program has been a

valuable part of IPC's demand side management efforts and a wholesale suspension of the program and the policy discussions that need to take place cannot be accomplished adequately and fully through modified procedure. This Intervenor respectfully requests this matter be processed with scheduling conference as soon as possible and with a formal hearing.

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; that the Commission order that a hearing be scheduled on this matter; and to allow this Intervenor to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to allow otherwise fully participate in the proceedings.

DATED this 7th day of January, 2013.

RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED

By 
ERIC L. OLSEN

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of January, 2013 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

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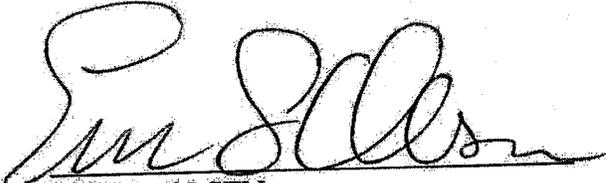
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January 7, 2013

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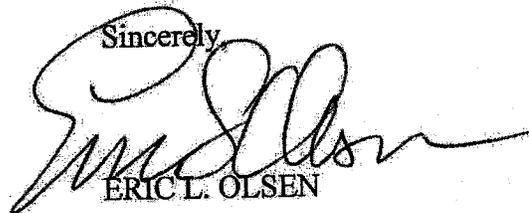
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