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IDAHO PUBLIC UTILITIES COMMISSION

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Attorney for Renewable Northwest Project and American Wind Energy Association

BEFORE THE

IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE
APPLICATION OF IDAHO POWER
COMPANY TO UPDATE ITS WIND
INTEGRATION RATES AND
CHARGES.

) Case No. IPC-E-13-22
)
) PETITION TO INTERVENE
) OF RENEWABLE NORTHWEST PROJECT AND
) AMERICAN WIND ENERGY ASSOCIATION
)

Renewable Northwest Project ("RNP") and American Wind Energy Association ("AWEA") hereby petition the Commission for leave to intervene in the above-titled proceeding pursuant to Rules 71 through 75 of the Commission's Rule of Practice and Procedure, IDAPA 31.01.01.072-.075. In support of this Petition, RNP and AWEA submit the following:

1. RNP is a non-profit regional advocacy group that works to facilitate the expansion of responsibly developed renewable energy resources in the Northwest. RNP's unique coalition of members includes renewable energy project developers, public and consumer interest groups, academic institutions, turbine manufacturers, and others. The common goal of RNP's members is to promote the development of a cost-effective, reliable, and clean energy system for the betterment of the Northwest economy and environment. In furtherance of this goal, RNP monitors and actively participates in numerous forums related to the integration of wind and

other variable energy resources. RNP has followed the development and review of Idaho Power Company's ("Idaho Power" or "the Company") 2013 Integrated Resource Plan and participated in other forums addressing the Wind Integration Study that underpins the Company's Application in this proceeding. The name and address of RNP is:

Renewable Northwest Project
421 SW 6th Ave, Suite 1125
Portland, OR 97204

2. AWEA is a national trade organization that represents a broad range of entities with a common interest in encouraging the expansion and facilitation of wind energy resources in the United States. AWEA's members include wind turbine manufacturers, component suppliers, project developers, project owners and operators, financiers, researchers, renewable energy supporters, utilities, marketers, customers and their advocates. AWEA also monitors and actively participates in various forums on wind integration issues. AWEA's name and address is:

American Wind Energy Association
1501 M Street, NW
Washington, DC

3. RNP and AWEA have a direct and substantial interest in this proceeding because the Commission's implementation of the Public Utility Regulatory Policies Act ("PURPA") has significant impacts on investment in renewable energy in Idaho. In addition, the Commission's review of Idaho Power's proposed charges and rates associated with integrating wind energy, and any policies adopted pursuant to such review, are likely to have significant impacts upon investment in wind generation in Idaho. Both petitioning organizations share an interest in promoting the responsible expansion of renewable energy in the Northwest, and decisions issued in this case may impact their ability to advance that interest. Moreover, certain of RNP and AWEA's members sell the output of their wind energy facilities to Idaho Power; if the Commission approves the proposals contained in the Company's Application, such proposals

would have a material adverse effect upon these members' projects. Accordingly, no other party can adequately address the interests of RNP and AWEA in this proceeding.

4. RNP and AWEA seek intervention in this proceeding with full rights of a party to, if necessary, introduce evidence, cross-examine, and participate in hearings or oral argument or otherwise present such materials as may be relevant to the Commission's decision in this matter. The exact quantity of evidence that RNP and AWEA would introduce cannot be stated at this time, but RNP and AWEA's participation will not unduly broaden the issues or cause delays.
5. RNP and AWEA believe that the nature and complexity of the issues presented by Idaho Power's Application are such that they would be best examined by a technical hearing. RNP and AWEA request that the Commission schedule a technical hearing, preceded by an appropriate period of time during which the parties may conduct discovery.
6. In accordance with IDAPA 31.01.01.063, RNP and AWEA request that the Commission direct that service among the parties be accomplished by electronic mail for information other than that which might be deemed confidential or otherwise must be hand-delivered. RNP and AWEA request that all pleadings, papers, orders, and notices be served upon:

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And

Dina M. Dubson
Renewable Northwest Project
421 SW 6th Ave, Suite 1125
Portland, OR 97204
Telephone: (503) 223-4544
Email: dina@rnp.org

WHEREFORE, RNP and AWEA respectfully request that the Commission grant this Petition to Intervene and authorize RNP and AWEA to participate in the above-captioned proceeding with the full rights of a formal party.

DATED this 21st day of January, 2014

K&L Gates, LLP

By 

Teresa Hill
Attorney for RNP and AWEA

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of January, 2014, a true and correct copy of the foregoing PETITION TO INTERVENE OF RENEWABLE NORTHWEST PROJECT AND AMERICAN WIND ENERGY ASSOCIATION, Case No. IPC-E-13-22, was served to:

Hand Delivered

Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702

By Electronic Mail

Donovan E. Walker
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DATED this 21st day of January, 2014

K&L Gates, LLP

By



Teresa Hill
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