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IDAHO PUBLIC UTILITIES COMMISSION

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Attorneys for Idaho Wind Partners I, LLC

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

**IDAHO WIND PARTNERS I, LLC'S  
PETITION TO INTERVENE**

Idaho Wind Partners I, LLC ("IWP") petitions the Idaho Public Utilities Commission ("Commission") to intervene in the above-entitled matter pursuant to Rule 71 through 75 of the Commission's Rules of Practice and Procedure, Idaho Administrative Rules 31.01.01.071 – 075.

In support of this Petition, IWP states as follows:

1. The name and address of IWP is:

Idaho Wind Partners I, LLC  
c/o RP Wind ID, LLC, its Managing Member  
82 Elm Street  
PO Box 2049  
Manchester Center, VT 05255

2. IWP's representatives for the purpose of service of pleadings and other written materials are:

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3. IWP owns and operates eleven wind farm developments, with a combined capacity of 183 MW, in the Magic Valley of Idaho. IWP's project portfolio in Idaho consists of the following projects: Burley Butte, Golden Valley, and Milner Dam in Cassia County; Camp Reed in Elmore County; and Oregon Trail, Payne's Ferry, Pilgrim Stage Station, Salmon Falls, Thousand Springs, Tuana Gulch, and Yahoo Creek in Twin Falls County (collectively, the "Projects"). The Projects are Qualifying Facilities ("QFs") pursuant to the Public Utility Regulatory Policies Act of 1978 ("PURPA"). The Projects are subject to existing Firm Energy Sales Agreements ("FESAs") with Idaho Power, each of which has been approved by the Commission.

4. IWP claims a direct and substantial interest in this proceeding because if accepted, some or all the proposals in Idaho Power's Application, including the proposal to impose new wind integration charges on projects with existing FESAs, could have a material adverse economic impact on the Projects.

5. To protect its interests, IWP requests an opportunity to fully participate as a party in this proceeding and in any hearing, including, as necessary, to submit legal briefing, conduct discovery, file motions and pleadings, provide written and oral argument, introduce evidence,

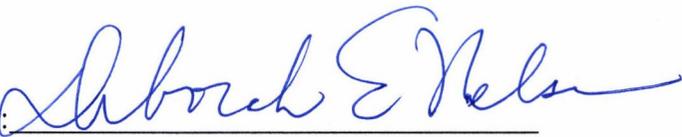
call and examine witnesses, and cross-examine witnesses, on the issues raised by Idaho Power's Application. Given the nature and complexity of issues presented by Idaho Power's Application, IWP requests that the Commission schedule a technical hearing, preceded by an appropriate period during which discovery may be conducted.

6. IWP's participation in this case will not unduly expand the issues or prejudice any party.

Accordingly, IWP respectfully requests that the Commission grant this Petition to Intervene and authorize IWP to participate in the above-entitled proceeding with full rights as a formal party.

DATED this 21<sup>st</sup> day of January 2014.

GIVENS PURSLEY LLP

By: 

Deborah E. Nelson

*Attorneys for Idaho Wind Partners I, LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have on this 21<sup>st</sup> day of January 2014, served the foregoing upon all parties of record in this proceeding, by delivering an original and seven copies upon:

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

And by mailing a copy thereof, properly addressed with postage prepaid, to:

Donovan E. Walker  
Julia A. Hilton  
Idaho Power Company  
1221 W. Idaho St.  
P.O. Box 70  
Boise, ID 83702

Dean J. Miller  
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Deborah E. Nelson