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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Meadow Creek Project Company 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

**MEADOW CREEK PROJECT
COMPANY LLC'S PETITION TO
INTERVENE**

Meadow Creek Project Company LLC ("Meadow Creek") petitions the Idaho Public Utilities Commission ("Commission") intervene in the above-entitled matter pursuant to Rule 71 through 75 of the Commission's Rules of Practice and Procedure, Idaho Administrative Rules 31.01.01.072 – 075. In support of this Petition, Meadow Creek states as follows:

1. The name and address of Rockland is:

Meadow Creek Project Company LLC
c/o Atlantic Power Corporation
1 Federal Street, 30th Floor
Boston, MA 02110

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

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3. Meadow Creek owns and operates two wind farm developments with nameplate capacities of 80 MW (North Point) and 40 MW (Five Pine) located in Bingham County, Idaho ("Projects"). The Projects are Qualifying Facilities ("QFs") under the Public Utility Regulatory Policies Act of 1978 ("PURPA"). The Projects are subject to existing Firm Energy Sales Agreements, as amended ("FESAs") with Rocky Mountain Power. The Commission approved the FESAs in Case Nos. PAC-E-11-03 and PAC-E-11-05 and through IPUC Order 32419.

4. Meadow Creek 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. Although Rocky Mountain Power is not currently a party to this proceeding, Idaho Power's Application raises important legal issues, including whether an additional wind integration charge may be imposed on wind projects with existing FESAs. The outcome of these legal issues may impact Meadow Creek's Projects even if Rocky Mountain Power does not intervene in this proceeding. In addition, in Meadow Creek's experience, proceedings such as this, even if initiated only by Idaho Power, have an impact on surrounding wind farm development and operation, including the ability to obtain financing.

5. To protect its interests, Meadow Creek 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, Meadow Creek requests that the Commission schedule a technical hearing, preceded by an appropriate period during which discovery may be conducted.

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

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

DATED this 21st day of January 2014.

GIVENS PURSLEY LLP

By:



Deborah E. Nelson

Attorneys for Meadow Creek Project Company LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have on this 21st 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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