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IDAHO PUBLIC UTILITIES COMMISSION

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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