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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Rockland Wind Farm, 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

**ROCKLAND WIND FARM, LLC'S
PETITION TO INTERVENE**

Rockland Wind Farm, LLC (“Rockland”) 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 31.01.01.071 – 075.

In support of this Petition, Rockland states as follows:

1. The name and address of Rockland is:

Rockland Wind Farm, LLC
1300 N. Northlake Way, 2nd Floor
Seattle, WA 98103

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

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3. Rockland owns and operates a wind farm development with a nameplate capacity of 80 MW located in Power County, Idaho (“Project”). The Project is a Qualifying Facility (“QF”) under the Public Utility Regulatory Policies Act of 1978 (“PURPA”). The Project is subject to an existing Firm Energy Sales Agreement, as amended (“FESA”) with Idaho Power. The Commission approved the FESA in Case No. IPC-E-10-24.

4. Rockland 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 Project.

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