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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for the United States Department of Energy and the  
Federal Executive Agencies

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION )  
OF PACIFICORP D/B/A ROCKY )  
MOUNTAIN POWER AND IDAHO ) CASE NO. IPC-E-14-41  
POWER COMPANY FOR AN ORDER )  
AUTHORIZING THE EXCHANGE OF ) CASE NO. PAC-E-14-11  
CERTAIN TRANSMISSION ASSETS. )  
)  
) PETITION TO INTERVENE OF THE  
) UNITED STATES DEPARTMENT  
) OF ENERGY AND THE FEDERAL  
) EXECUTIVE AGENCIES  
)  
\_\_\_\_\_ )

COMES NOW, the United States Department of Energy (“DOE” or “Department”) on behalf of itself and the Federal Executive Agencies (“FEA”), hereinafter collectively referred to as “Intervenor,” and pursuant to this Commission’s Rules of Procedure, Rule 71 IDAPA 31.01.01.71, hereby petitions the Commission for leave to intervene herein and to appear and participate herein as a party. In support of this petition, the Department states as follows:

1. The name and address of this Intervenor is:

The United States Department of Energy  
c/o Steven Porter  
Office of the General Counsel (GC-76)  
1000 Independence Avenue, SW (Room 6D-033)

Washington, D.C. 20585  
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E-mail: [Steven.Porter@hq.doe.gov](mailto:Steven.Porter@hq.doe.gov)

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Steven Porter as noted above and to:

Dwight Etheridge  
10480 Little Patuxent Parkway  
Suite 300  
Columbia, MD 21044  
Telephone: 410-992-7500  
Fax: 410-992-3445  
E-mail: [detheridge@exeterassociates.com](mailto:detheridge@exeterassociates.com)

2. The Idaho Power Company (“IPC” or “Company”) serves DOE’s Idaho National Laboratory (“INL”), a science-based, applied engineering laboratory located in southern Idaho and dedicated to supporting DOE’s research programs in nuclear energy, national and homeland security, and clean energy. INL takes service from IPC under a special contract, in accordance with the rates and charges set out in Electric Service Rate Schedule 30 and its successor schedules. Therefore, DOE has a direct and substantial interest in these proceedings, which would not be represented by other parties, in that the outcome of these proceedings may affect the Company’s electric rates for INL.

3. DOE has been delegated by the United States General Services Administration pursuant to Sec. 210(a)(4) of the Federal Property Management and Administrative Services Act of 1949, as amended (40 U.S.C. 501(c)), to represent the customer interests of the Federal Executive Agencies of the United States Government in IPC proceedings. Other federal facilities taking electric service from IPC include the United States Air Force’s Mountain Home Air Force Base, located in southwestern, Idaho.

4. This Intervenor, on behalf of DOE as well as the FEA, intends to participate herein as a party, and if necessary, to introduce evidence, submit comments, and fully participate in any hearing that may occur including the calling and cross examination of witnesses. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

5. Without the opportunity to intervene herein, this Intervenor would be without any effective means of participation in this proceeding which may have a material impact on the electric rates and/or service provided to DOE/FEA facilities.

6. Granting this Intervenor's petition to intervene will not unduly burden the issues nor will it prejudice any party to this case.

7. The undersigned DOE attorney, Steven A. Porter, is not admitted to practice before the courts of the state of Idaho, and is admitted to practice before the courts of the state of Texas. Mr. Porter has been in the active practice of law since 1981. Mr. Porter is not under suspension or disbarment by any of the courts of the state in which he is admitted to practice. Mr. Porter will in the future petition for leave to appear *pro hac vice* herein. DOE respectfully requests that this petition to intervene be granted subject to the condition that in the future Steven A. Porter, or another DOE attorney, obtains approval from this Commission for a petition for leave to appear *pro hac vice* herein.

**WHEREFORE**, the United States Department of Energy, on behalf of itself and the Federal Executive Agencies respectfully requests that this Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument at any hearing that may occur, and to otherwise fully participate in these proceedings.

DATED this 26<sup>th</sup> day of January 2015.

Respectfully Submitted,



Steven A. Porter (Texas Bar No. 16150700)

Assistant General Counsel

Electricity and Fossil Energy

United States Department of Energy

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 26<sup>th</sup> day of January, 2015, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF THE UNITED STATES DEPARTMENT OF ENERGY AND THE FEDERAL EXECUTIVE AGENCIES, was served by overnight mail, properly addressed and postage pre-paid, to the service list provided below.

Respectfully Submitted,



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