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IDAHO PUBLIC  
 UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE JOINT	)	CASE NO. PAC-E-05-8
APPLICATION OF MIDAMERICAN	)	
ENERGY HOLDINGS COMPANY (MEHC)	)	
AND PACIFICORP DBA UTAH POWER &	)	COMMUNITY ACTION
LIGHT COMPANY FOR AN ORDER	)	PARTNERSHIP ASSOCIA-
AUTHORIZING MEHC TO ACQUIRE	)	TION OF IDAHO'S
PACIFICORP	)	PETITION TO INTERVENE
_____	)	

COMES NOW, Community Action Partnership Association of Idaho (hereinafter "CAPAI" or "Intervenor") and, pursuant to Rules 071-075 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-075, hereby petitions the Commission for leave to intervene in this proceeding and to appear and participate with full parties' rights. In support of this Petition, CAPAI states as follows:

1. The address and name of the respective Intervenor is:

Community Action Partnership Association of Idaho  
 P.O. Box 8224  
 Boise, ID. 83707

2. This Intervenor will be represented in this proceeding by, **and pleadings and**

**other correspondence need only be sent to:**

Brad M. Purdy

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3. CAPAI is a non-profit corporation consisting of six community action agencies serving every county in Idaho and also includes, among others, the statewide Idaho Migrant Council and fights the causes and conditions of poverty through building the capacity and effectiveness of its members who have a direct and substantial interest in this proceeding. These causes and conditions of poverty include high utility costs for PacifiCorp's low income rate payers. Low income families pay a higher percentage of their income for utility expenses than those in other economic categories. These conditions are often caused by living in sub-standard or older housing that is not energy efficient. Weatherization offers energy efficient retrofits for homes owned by low-income rate payers (at 150% poverty level). Currently, weatherization programs in Idaho have as much as a six year backlog of customers needing the service.

CAPAI, if allowed intervention, will, among other things, ensure that the proposed merger is in the best interests of all ratepayers, particularly those falling into the low-income category. CAPAI will also address the current levels of funding in PacifiCorp's low-income weatherization program as well as numerous other issues related to low-income ratepayers.

In its settlement negotiations with PacifiCorp during the recent general rate case (Case No. PAC-E-05-1), CAPAI and PacifiCorp reached an agreement under a compressed timeline. PacifiCorp explicitly acknowledged that to the extent CAPAI's

concerns had not been fully addressed, the merger case, soon to be filed, would be an appropriate opportunity to raise those issues again.

The Commission is, of course, not obligated by this understanding between the parties. CAPAI offers it, however, for the Commission's consideration. CAPAI continues to be the only party regularly appearing before this Commission that represents low-income utility customers. CAPAI's proposals have led, and will continue to lead, to the implementation and enhancement of programs that benefit not only low-income ratepayers, but the general body of customers as well through the reduction of collection costs, bad debt write-offs, improved cash flow, disconnection and reconnections costs, etc.

4. CAPAI intends to participate in this proceeding as a party and introduce testimony and exhibits, cross-examine other witnesses, engage in oral argument and otherwise fully participate as a party.

WHEREFORE, the Community Action Partnership of Idaho hereby requests that this Commission grant its Petition to Intervene in this proceeding and to fully appear and participate as a party with all the attendant rights and responsibilities.

DATED, this <sup>th</sup>30 day of August, 2005.

  
Brad M. Purdy

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 30<sup>th</sup> day of August, 2005, I caused to be served the foregoing PETITION TO INTERVENE OF COMMUNITY ACTION PARTNERSHIP ASSOCIATION OF IDAHO on the following, in the manner indicated, in Case No. PAC-E-05-~~8~~

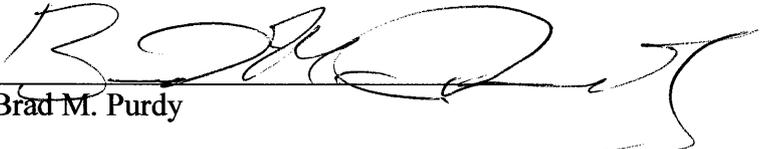
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