

Ann English Gravatt
RENEWABLE NORTHWEST PROJECT
917 SW Oak Street, Suite 303
Portland, OR 97205
Ph: (503) 223-4544
Fax: (503) 223-4554
ann@rnp.org

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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF)	
PACIFICORP DBA ROCKY MOUNTAIN)	CASE NO. PAC-E-09-07
POWER FOR AN ORDER REVISING THE)	
WIND INTEGRATION RATE FOR)	PETITION TO INTERVENE
WIND-POWERED SMALL POWER)	
GENERATION QUALIFYING FACILITIES)	
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Pursuant to Idaho Public Utilities Commission Rules of Procedure 53 and 71 through 73, Renewable Northwest Project ("RNP") hereby seeks intervention in the above-captioned matter. As discussed below, RNP has direct and substantial interests in these proceedings, and therefore should be granted intervention.

Established in 1994, RNP promotes the responsible expansion of solar, wind and geothermal energy in the Northwest. RNP works to establish policies that support renewable energy development and nurture the development of a market for renewable energy. RNP's unique coalition of members includes renewable energy project developers, public and consumer interest groups, turbine manufacturers, environmental organizations and others. RNP's address is 917 SW Oak St, Suite 303; Portland, Oregon, 97205.

RNP has direct and substantial interests in this proceeding because the Commission's implementation of the federal Public Utilities Regulatory Policies Act (PURPA) has significant impacts upon investment in renewable energy in Idaho. The Commission's decision regarding Rocky Mountain Power (RMP)'s petition to increase the avoided cost integration rate applicable to purchases by RMP from wind QFs from \$5.10 to \$9.96 per MWH is likely to have significant impacts upon investment in wind power generation in Idaho. RNP has an interest in promoting the responsible expansion of renewable energy in the Northwest, and decisions issued in this case may impact its ability to advance that interest. In addition, RNP has been previously involved with the issue of wind integration rates before the Commission and was a party in Case No. PAC-E-07-07, Case No. IPC-E-05-22 and others.

RNP seeks intervention in order to fully participate in this matter as parties and otherwise to present such materials as may be relevant to the Commission's decision(s) in this matter. RNP intends to separately seek intervenor funding pursuant to RP 161 through 165.

PLEASE TAKE NOTICE that RNP requests all documents in this matter be served to the following persons:

Ann English Gravatt
Policy Director
Renewable Northwest Project
917 SW Oak St, Suite 303
Portland, OR 97205
ann@rnp.org

Suzanne Leta Liou
Senior Policy Advocate
Renewable Northwest Project
917 SW Oak St, Suite 303
Portland, OR 97205
suzanne@rnp.org

WHEREFORE, RNP respectfully requests that the foregoing petition to intervene be granted.

Dated: September 28, 2009

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Ann English Gravatt", written in black ink.

Ann English Gravatt

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of September 2009, true and correct copies of the foregoing PETITION TO INTERVENE were delivered to the following persons via the method of service noted:

U.S. Mail and Electronic Mail:

Jean Jewell
Commission Secretary (Original and seven copies provided)
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983
Jean.jewell@puc.idaho.gov

Daniel E. Solander
Senior Counsel
Rocky Mountain Power
201 South Main, Suite 2300
Salt Lake City, UT 84111
Daniel.solander@pacificorp.com

Ted Weston
Manager, Idaho Regulatory Affairs
Rocky Mountain Power
201 South Main, Suite 2300
Salt Lake City, UT 84111
Ted.weston@pacificorp.com



Ann English Gravatt