

LAW OFFICES OF

**RACINE OLSON NYE BUDGE & BAILEY  
CHARTERED**

W. MARCUS W. NYE  
RANDALL C. BUDGE  
JOHN A. BAILEY, JR.  
JOHN R. GOODELL  
JOHN B. INGELSTROM  
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BRENT O. ROCHE  
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FRED J. LEWIS  
ERIC L. OLSEN  
CONRAD J. AIKEN  
RICHARD A. HEARN, M.D.  
LANE V. ERICKSON  
FREDERICK J. HAHN, III  
PATRICK N. GEORGE  
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JOSHUA D. JOHNSON  
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FERRELL S. RYAN, III  
AARON A. CRARY  
JOHN J. BULGER  
BRETT R. CAHOON  
JEFFREY A. WARR

201 EAST CENTER STREET  
POST OFFICE BOX 1391  
POCATELLO, IDAHO 83204-1391

TELEPHONE (208) 232-6101  
FACSIMILE (208) 232-6109

[www.racinelaw.net](http://www.racinelaw.net)

SENDER'S E-MAIL ADDRESS: [elo@racinelaw.net](mailto:elo@racinelaw.net)

**BOISE OFFICE**  
101 SOUTH CAPITOL  
BOULEVARD, SUITE 300  
BOISE, IDAHO 83702  
TELEPHONE: (208) 395-0011  
FACSIMILE: (208) 433-0167

**IDAHO FALLS OFFICE**  
477 SHOUP AVENUE  
SUITE 107  
POST OFFICE BOX 50698  
IDAHO FALLS, ID 83405  
TELEPHONE: (208) 528-6101  
FACSIMILE: (208) 528-6109

**ALL OFFICES TOLL  
FREE**  
(877) 232-6101

LOUIS F. RACINE (1917-2008)  
WILLIAM D. OLSON, OF COUNSEL

December 11, 2012

Jean J. Jewell, Secretary  
Idaho Public Utilities Commission  
P.O. Box 83720  
Boise, Idaho 83720-0084

Re: Case No. PAC - E- 12 -14

Dear Mrs. Jewell:

Enclosed for filing in the captioned case please find the original and seven copies of **PETITION OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. FOR LEAVE TO INTERVENE AND PROTEST TO MODIFIED PROCEDURE AND DEMAND FOR HEARING**

Thank you for your assistance.

Sincerely,



ERIC L. OLSEN

ELO:tjl

Enclosures

c: Service List (Via Email)

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2012 DEC 11 PM 3:33  
IDAHO PUBLIC  
UTILITIES COMMISSION

Eric L. Olsen (ISB#: 4811)  
RACINE, OLSON, NYE,  
BUDGE & BAILEY, CHARTERED  
P.O. Box 1391  
Pocatello, Idaho 83204-1391  
Telephone: (208)232-6101  
Fax: (208)232-6109  
Email: [elo@racinelaw.com](mailto:elo@racinelaw.com)

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IDAHO PUBLIC  
UTILITIES COMMISSION

*Attorneys for Intervenor Idaho Public Utilities Commission*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION)  
OF ROCKY MOUNTAIN POWER FOR)  
AUTHORITY TO CANCEL ELECTRIC)  
SERVICE SCHEDULE NOS 72 AND 72A)  
IRRIGATION LOAN CONTROL TARIFFS)  
AND APPROVE A NEW DEMAND SIDE)  
MANAGEMENT CONTRACT

**CASE NO. PAC-E-12-14**

**PETITION OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC.,**

**FOR LEAVE TO INTERVENE AND PROTEST TO MODIFIED PROCEDURE AND**

**DEMAND FOR HEARING**

COMES NOW Idaho Irrigation Pumpers Association, Inc., herein called "this Intervenor" and pursuant to Rules 72 and 73 of the rules of Procedure of the Idaho Public Utility Commission, and by this Petition asks leave to intervene herein and to appear and participate as a party herein, and as basis therefor states as follows:

- (1) The name and address of this Intervenor is:

Idaho Irrigation Pumpers Association, Inc.  
c/o Lynn Tominaga  
P.O. Box 2624  
Boise, Idaho 83701-2624

This Intervenor will be represented by:

Eric L. Olsen  
Racine, Olson, Nye, Budge &  
Bailey, Chartered  
P.O. Box 1391; 201 E. Center  
Pocatello, Idaho 83204-1391

and requests that copies of all pleadings and production requests and responses should be provided to the following:

Eric L. Olsen  
Racine, Olson, Nye, Budge &  
Bailey, Chartered  
P.O. Box 1391; 201 E. Center  
Pocatello, Idaho 83204-1391  
Telephone: (208) 232-6101  
Fax: (208) 232-6109  
E-mail: [elo@racinelaw.net](mailto:elo@racinelaw.net)

Anthony Yankel  
29814 Lake Road  
Bay Village, Ohio 44140  
Fax: 440-808-1450  
E-mail: [tony@yankel.net](mailto:tony@yankel.net)

(2) This Intervenor and its members have a direct and substantial interest in this proceeding and intend to participate in all respects herein as a party as may be required to represent its interests.

(3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

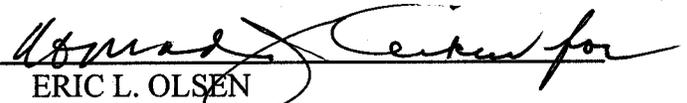
(4) Pursuant to Rule 203, the Intervenor hereby protests the use of modified procedure to address the termination of schedules 72 and 72A. These load control programs have been a valuable part of RMP's demand side management efforts since 2003 and a wholesale changing of the program and the policy discussions that need to take place cannot be accomplished adequately and fully through modified procedure. This Intervenor respectfully requests this matter be processed with scheduling conference as soon as possible and with a

formal hearing.

WHEREFORE, this Intervenor requests that this Commission confirm this Intervenor's leave to intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; that the Commission order that a hearing be scheduled on this matter; and to allow this Intervenor to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to allow otherwise fully participate in the proceedings.

DATED this 11<sup>th</sup> day of December, 2012.

RACINE, OLSON, NYE, BUDGE &  
BAILEY, CHARTERED

By   
ERIC L. OLSEN

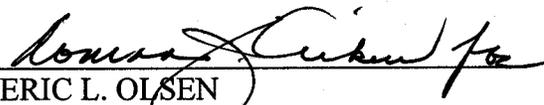
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 11<sup>th</sup> day of December, 2012 I served a true, correct and complete copy of the Petition of Idaho Irrigation Pumpers Association, Inc. For Leave to Intervene to each of the following, via U.S. Mail or private courier, e-mail or hand delivery, as indicated below:

Jean D. Jewell, Secretary	_____	U.S. Mail/Postage Prepaid
Idaho Public Utilities Commission	_____	E-mail
P.O. Box 83720	_____	Facsimile
472 W. Washington Street	_____	Overnight Mail
Boise, Idaho 83720-0074	<u>  X  </u>	Hand Delivered
<a href="mailto:jjewell@puc.state.id.us">jjewell@puc.state.id.us</a>		

Mark C. Moench	_____	U.S. Mail/Postage Prepaid
Daniel E. Solander	_____	E-mail
201 South Main, Suite 2300	_____	Facsimile
Salt Lake City, UT 74111	_____	Overnight Mail
Phone: (801) 220-4014	_____	Hand Delivered
Fax: (801) 220-3299		
Email: <a href="mailto:daniel.solander@pacificorp.com">daniel.solander@pacificorp.com</a>		
<a href="mailto:mark.moench@pacificorp.com">mark.moench@pacificorp.com</a>		

Ted Weston	_____	U.S. Mail/Postage Prepaid
Rocky Mountain Power	_____	E-mail
Manager, Idaho Regulatory Affairs	_____	Facsimile
201 South Main Street, Suite 2300	_____	Overnight Mail
Salt Lake City, UT 84111	_____	Hand Delivered
Phone: (801) 220-2963		
Fax: (801) 220-2798		
Email: <a href="mailto:ted.weston@pacificorp.com">ted.weston@pacificorp.com</a>		

  
 \_\_\_\_\_  
 ERIC L. OLSEN