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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S PETITION TO MODIFY)	CASE NO. IPC-E-15-01
TERMS AND CONDITIONS OF)	
PROSPECTIVE PURPA ENERGY SALES)	PETITION TO INTERVENE
AGREEMENTS)	OF THE AMALGAMATED SUGAR
)	COMPANY
)	
)	
)	

COMES NOW, The Amalgamated Sugar Company LLC, hereinafter 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, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

The Amalgamated Sugar Company LLC
Scott Dale Blickenstaff ISB #7551
1951 S. Saturn Way, Ste. 100
Boise, Idaho 83702
Telephone: (208) 383-6584
sblickenstaff@amalsugar.com

2. This Intervenor, The Amalgamated Sugar Company, is a Delaware limited liability company duly qualified to do business in the State of Idaho. The Amalgamated Sugar Company receives electric utility services from Idaho Power Company and operates cogeneration facilities at its Nampa and Twin Falls sugar refinery operations. The cogeneration

facilities currently serve internal needs, except the Nampa facility sells surplus generation to Idaho Power pursuant to Schedule 72 (IPC-E-06-29). The Amalgamated Sugar Company claims a direct and substantial interest in this proceeding in that its ability to make long term PURPA QF sales to Idaho Power may be affected by the outcome of this proceeding.

3. This Intervenor intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

4. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on its ability to make long term PURPA sales to Idaho Power.

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

WHEREFORE, The Amalgamated Sugar Company 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 and to otherwise fully participate in these proceedings.

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