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IDAHO PUBLIC  
UTILITIES COMMISSION

*Attorneys for Ecoplexus, Inc.*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF IDAHO POWER ) Case No. IPC-E-15-01**  
**COMPANY’S PETITION TO MODIFY )**  
**TERMS AND CONDITIONS OF ) PETITION TO INTERVENE OF**  
**PROSPECTIVE PURPA ENERGY ) ECOPLEXUS, INC.**  
**SALES AGREEMENTS )**  
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COMES NOW Ecoplexus, Inc., a Delaware corporation (“Ecoplexus”) and petitions to intervene in the above matter pursuant to the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-.75. As discussed below, Ecoplexus has a direct and substantial interest in these proceedings, and therefore the Commission should grant intervention.

**PETITION TO INTERVENE**

**I.**

Ecoplexus is a leader in the development, design, engineering, construction and financing of solar energy systems for nonprofit, commercial, municipal, and utility markets.

Ecoplexus has requested pricing and energy service agreements from Idaho Power Company and Rocky Mountain Power in 2014 and 2015 for several proposed, qualifying facility,

solar generating projects located in Elmore, Minidoka, Caribou and Bonneville Counties, State of Idaho. More specifically, Ecoplexus has proposed projects totaling 160 MW in Idaho Power Company service territory and 280 MW in Rocky Mountain Power service territory.

**II.**

Ecoplexus requests that all pleadings, correspondence, discovery, and other documents be served on the following:

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**III.**

This Petition to Intervene is not timely pursuant to Order No. 33222. However, Ecoplexus was not aware of this proceeding until recently. Ecoplexus's participation will not broaden the issues, delay the proceedings or result in prejudice to any party.

**IV.**

Ecoplexus 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 Ecoplexus will introduce is dependent upon the nature and effect of other evidence in this proceeding.

For example, Ecoplexus wishes to participate in this proceeding to address whether the relief requested in Idaho Power Company's Application should also be granted to Rocky Mountain Power. Ecoplexus contends that Rocky Mountain Power's resource needs and current