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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for the J. R. Simplot Company

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 J. R. SIMPLOT COMPANY
_____)

COMES NOW, The J. R. Simplot Company, hereinafter referred to as "Intervenor," and pursuant to this Commission's Rule of Procedure, Rule 071, IDAPA 31.10.01074, 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:

J. R. Simplot Company
Attn: Don Sturtevant
P.O. Box 27
Boise, ID 83707

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2. This Intervenor will be represented herein by:

Peter J. Richardson (ISB No. 3195)
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3. Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to:

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Dr. Don Reading
6070 Hill Road
Boise, Idaho 83703
(208) 342-1700
dreading@mindspring.com

4. This Intervenor, the J. R. Simplot Company is a corporation duly qualified to do business in the State of Idaho.

5. The J. R. Simplot Company currently operates a qualifying facility (“QF”) at its operations in Pocatello, Idaho, which utilizes waste heat in an industrial cogeneration process and has a nameplate capacity of 15.9 megawatts (“MW”). It has a PURPA contract providing