



ECHO HAWK & OLSEN

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September 6, 2016

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
P.O. Box 83720
472 W. Washington Street
Boise, ID 83720-0074

RECEIVED
2016 SEP -9 AM 8:54
IDAHO PUBLIC
UTILITIES COMMISSION

**Re: Filing of Petition of Idaho Irrigation Pumpers Association, Inc. for Leave to Intervene
Case No. PAC-E-16-12**

Dear Commission Secretary Jewell:

Enclosed for filing in the above-referenced matter please find the original and eight (8) copies of the Petition of Idaho Irrigation Pumpers Association, Inc. for Leave to Intervene. Please file the Petition accordingly and return a conformed copy to us in the enclosed envelope.

Thank you for your kind assistance. Please contact me if you have any questions.

Sincerely,

Monica Sanada
Paralegal

Eric L. Olsen (ISB# 4811)
ECHO HAWK & OLSEN, PLLC
505 Pershing Ave., Ste. 100
P.O. Box 6119
Pocatello, Idaho 83205
Telephone: (208) 478-1624
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UTILITIES COMMISSION

Attorney for Intervenor Idaho Irrigation Pumpers Association, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE
APPLICATION OF ROCKY MOUNTAIN
POWER TO UPDATE BASE NET
POWER COSTS AND IMPLEMENT A
RATE STABILITY PLAN**

**CASE NO. PAC-E-16-12
PETITION OF IDAHO IRRIGATION
PUMPERS ASSOCIATION, INC. FOR
LEAVE TO INTERVENE**

COMES NOW Idaho Irrigation Pumpers Association, Inc. herein called "this Intervenor" and pursuant to Rules 71 through 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 Intervenor is:

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

This Intervenor will be represented by:

Eric L. Olsen
ECHO HAWK & OLSEN, PLLC
505 Pershing Ave., Ste. 100
P.O. Box 6119
Pocatello, Idaho 83205

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

Eric L. Olsen
ECHO HAWK & OLSEN, PLLC
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Pocatello, Idaho 83205
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Anthony Yankel
12700 Blake Avenue, Unit 2505
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Email: tony@yankel.net

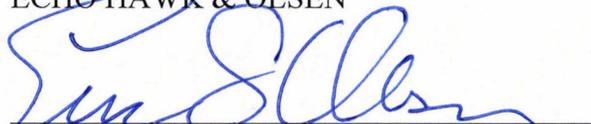
2) This Intervenor and its members have a direct and substantial interest in this proceeding and intend to participate in all respects herein as a party as may be required to represent its interests.

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.

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 6th day of September, 2016.

ECHO HAWK & OLSEN



ERIC L. OLSEN

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of September, 2016, 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, email or hand delivery, as indicated below:

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
P.O. Box 83720
472 W. Washington Street
Boise, ID 83720-0074
jjewell@puc.state.id.us

- U.S. Mail
- Hand Delivered
- Overnight Mail
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